



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY - 1 2008

Ms. Nang-Ly Chow
Bayer Cropscience LP
2 T.W. Alexander Dr, PO Box 12014
Research Triangle Park, NC 27709

Subject: Iodosulfuron 10 WDG
EPA Registration Number 264-856
Submission dated December 17, 2007

Dear Ms. Chow:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

- 1) Submit the results of the following outstanding data requirement by the December 8, 2008 deadline
 - a. Acute neurotoxicity study in rats
- 2) Add an appropriate EPA Establishment Number to the label.
- 3) Add "exist" after "washables" in the statement "If no such instructions for washables, use detergent and hot water"
- 4) Add "/PPE" after "clothing" in the statement "Remove clothing immediately if pesticide gets inside" in the section USER SAFETY RECOMMENDATIONS
- 5) On page 2, revise "is recommended" to "may be used" in the section GENERAL INFORMATION
- 6) On page 3, remove "are recommended" in the section APPLICATION METHODS

Submit one (1) copy of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records. If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,

James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

IODOSULFURON 10 WDG HERBICIDE

For postharvest burndown application prior to planting Corn and Soybean.

ACTIVE INGREDIENTS:

Iodosulfuron-Methyl Sodium* (CAS Number 144550-36-7).....10.00%

OTHER INGREDIENTS:.....90.00%

TOTAL.....100.00%

*This product is a water-dispersible granule (WDG) containing 10% of the active ingredient by weight.

EPA Reg No. 264-856

E.P.A. Est. No.

KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

For **MEDICAL** And **TRANSPORTATION** Emergencies **ONLY** Call 24 Hours A Day 1-800-334-7577
For **PRODUCT USE** Information Call 1-866-99BAYER (1-866-992-2937)

FIRST AID

IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 – 20 minutes. • Call a poison control center or doctor for treatment advice.

For MEDICAL Emergencies Call 24 Hours A Day 1-800-334-7577.

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

PRECAUTIONARY STATEMENTS

CAUTION

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Harmful if inhaled. Avoid breathing dust. Causes moderate eye irritation. Avoid contact with eyes or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: Long-sleeved shirt and long pants 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.

ACCEPTED
with COMMENTS
in EPA Letter Dated

MAY - 1 2008

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

264-856

ENGINEERING CONTROL STATEMENT:

When handlers use closed systems or enclosed cabs 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

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

ENVIRONMENTAL HAZARDS

This product is toxic to non-target plants. Do not apply when conditions favor drift from treated areas. 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 cleaning equipment or disposing of equipment washwaters. Do not drain or rinse equipment near desirable vegetation.

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 same 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 shoes and chemical resistant gloves made of any waterproof material.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:

Keep container tightly closed when not in use. Avoid cross contamination with other pesticides.

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:

Empty containers should be triple rinsed (or equivalent), then offered for recycling or reconditioning; or puncture and disposed of in a sanitary landfill, or by incineration; or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

GENERAL INFORMATION

Iodosulfuron 10 WDG Herbicide is a sulfonyleurea herbicide. Iodosulfuron 10 WDG is recommended for burndown of existing vegetation and residual weed control when applied to no-till or conservation tillage fields anytime after the fall harvest. Do not apply to frozen ground. Weed growth ceases within hours after Iodosulfuron 10 WDG Herbicide is applied. Symptoms progress from yellowing to necrosis resulting in eventual plant death within 1-4 weeks after application.

Iodosulfuron 10 WDG Herbicide will not provide season-long preemergence control of annual grass and broadleaf weeds.

- For extended control in glufosinate-tolerant corn, follow Iodosulfuron 10 WDG Herbicide with an in-season application of LIBERTY herbicide.
- For extended control in conventional corn, follow Iodosulfuron 10 WDG Herbicide with sequential programs based on targeted weeds. Such programs include Balance[®], Define[®], Radius[®], Option[®], and Buctrif[®] Herbicides.
- For season long control in soybean, follow Iodosulfuron 10 WDG Herbicide with a sequential program based on targeted weeds.

APPLICATION TIMING

Iodosulfuron 10 WDG Herbicide should be applied after the fall harvest and up to 30 days prior to planting field corn, or up to 90 days prior to planting soybean. Do not apply to frozen ground. Best results are obtained when applications are made to actively growing weeds. Iodosulfuron 10 WDG Herbicide will affect weeds that are larger than the listed height, however, speed of activity and control may be reduced. Iodosulfuron 10 WDG Herbicide will provide short term residual of small seeded broadleaf weeds.

SPRAY ADDITIVES

Iodosulfuron 10 WDG Herbicide is a water dispersible granule that requires the use of an external adjuvant and nitrogen fertilizer.

- The addition of Crop Oil Concentrate at 1% v/v (1 gallon per 100 gallons of final spray volume) is required.
- The addition of nitrogen fertilizer (28 or 32% Urea Ammonium Nitrate at 1.5-2 qts/acre or Spray Grade Ammonium Sulfate at 1.5-3.0 lbs/acre) is required.

APPLICATION METHODS

Uniform, thorough spray coverage is important to achieve consistent weed control. Select spray nozzles and pressure that deliver MEDIUM spray droplets as indicated in nozzle manufacturer's catalogs and in accordance with ASAE Standard S-572. Nozzles that deliver COARSE spray droplets may be used to reduce spray drift provided spray volume per acre (GPA) is increased to maintain coverage of weeds.

Do not use nozzles that produce FINE (e.g. – Cone) or EXTRA COARSE (e.g. – Flood jet) spray droplets.

Do not apply Iodosulfuron 10 WDG Herbicide using aerial application.

GROUND APPLICATION

Iodosulfuron 10 WDG Herbicide may be applied as a broadcast treatment in a minimum of 10 gallons of water per acre. For weed control in dense weed populations, control of weeds under adverse growing conditions, or control of mature weeds use higher spray volumes up to 30 gallons per acre are recommended.

Typically flat fan nozzles operated at 30-60 PSI will deliver MEDIUM spray droplets, providing optimum spray coverage and canopy penetration. Lower pressure operation and/or higher volume flat fan nozzles, typically deliver COARSE sprays. Refer to nozzle manufacturer catalogs.

Air induction nozzles should be used at or near 60 psi to produce a medium droplet size.

SPRAY DRIFT MANAGEMENT

Iodosulfuron 10 WDG Herbicide is not volatile. Damage to sensitive crops can occur as a result of spray drift. Spray drift can be managed by several application factors and by spraying under appropriate climatic conditions. Consequently, avoidance of spray drift is the responsibility of the applicator.

SENSITIVE AREAS: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Do not apply under circumstances where possible drift to unprotected persons or to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption can occur.

INFORMATION ON DROPLET SIZE

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift, if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature inversions below).

Uniform, thorough spray coverage is important to achieve consistent weed control. Select nozzles and pressure that deliver MEDIUM spray droplets as indicated in nozzle manufacturer's catalogs and in accordance with ASAE Standard S-572. Nozzles that deliver COARSE spray droplets may be used to reduce spray drift provided spray volume per acre (GPA) is increased to maintain coverage of weeds.

CONTROLLING DROPLET SIZE:

- Volume – Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure – Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of nozzles – Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation – Orienting nozzles so that the spray is released parallel to the air stream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type – Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

BOOM LENGTH:

For some use patterns, reducing the effective boom length may further reduce drift without reducing swath width.

APPLICATION HEIGHT:

Apply with nozzle height no more than 4 feet above the ground or crop canopy.

SWATH ADJUSTMENT:

When applications are made with a crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the sprayer upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

WIND:

Drift potential is lowest between wind speeds of 2 – 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. Wind speed must be measured adjacent to the application site, on the upwind side, immediately prior to application.

NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY:

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry. Avoid spraying during conditions of low humidity and/or high temperatures.

TEMPERATURE INVERSIONS:

- Do not make applications into areas of temperature inversions. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Mixing Instructions

Iodosulfuron 10 WDG Herbicide must be applied with clean and properly calibrated equipment. Prior to adding Iodosulfuron 10 WDG Herbicide, ensure that the spray tank, filters and nozzles have been thoroughly cleaned.

1. Fill spray tank with 25% of the required volume of water, and begin agitation prior to the addition of Iodosulfuron 10 WDG Herbicide.
2. Continue agitation to ensure full dispersion of Iodosulfuron 10 WDG Herbicide.
3. If Iodosulfuron 10 WDG Herbicide is applied in a tank mixture with other pesticides, add Iodosulfuron 10 WDG Herbicide to the spray tank first and ensure it is thoroughly dispersed before adding other pesticides.
4. Continue to fill the spray tank with water to the desired volume and agitate while adding spray adjuvants and nitrogen fertilizers.
5. Continue agitation during application to ensure a uniform spray mixture. (If Iodosulfuron 10 WDG Herbicide is added to a partial tank of spray solution, pre-slurry Iodosulfuron 10 WDG Herbicide with clean water prior to adding to the spray tank).

If ammonium sulfate (AMS) is the nitrogen fertilizer source, it is preferred that the AMS go into the spray tank prior to Iodosulfuron 10 WDG Herbicide.

RE-SUSPENDING WDG PRODUCTS IN SPRAY SOLUTION

Like other water dispersible granules or suspension concentrates (SC's), Iodosulfuron 10 WDG Herbicide will settle if left standing without agitation. If the spray solution is allowed to settle for one hour or more, re-agitate the spray solution for a minimum of 10 minutes before application.

COMPATIBILITY

If Iodosulfuron 10 WDG Herbicide is to be tank-mixed with other pesticides not listed specifically on this label, compatibility should be tested prior to mixing. To test for compatibility, use a small container and mix a small amount (0.5 to 1qt) of spray, combining all ingredients in the same ratio as the anticipated use. If any indications of physical incompatibility develop (precipitation, settling, changes in color) do not use this mixture for spraying. Indications of incompatibility may occur within 5-15 minutes after mixing. Read and follow the label of each tank mix product used for precautionary statements, directions for use, geographic and other restrictions.

WEED CONTROL INSTRUCTIONS

Rate Tables for Weed Control

Iodosulfuron 10 WDG Herbicide may be applied at a rate of up to a maximum of 0.3 ounces of product per acre (0.001875 lbs active ingredient per acre) in crop stubble for the control of certain broadleaf weeds up to 3 inches in height and annual grasses no greater than 1 inch in height. Weeds controlled are listed below:

- | | |
|--|------------------------|
| Alfalfa | Mouse-eared chickweed |
| Annual Bluegrass | Pennycress |
| Blue Mustard | Pokeweed (Suppression) |
| Broadleaf plantain | Poison Hemlock |
| Burcucumber | Purple deadnettle |
| Burdock | Redroot pigweed |
| Buttercup | Scentless Chamomile |
| Canada Thistle (Suppression) | Shepherd's purse |
| Common chickweed | Tansy mustard |
| Dandelion | Turnip weed |
| Field pennycress | Volunteer canola |
| Hemp Nettle | Wild Carrot |
| Henbit | Wild mustard |
| Horsenettle | Wild radish |
| Marestail (including glyphosate resistant) | |

Weed Resistance

ALS-resistance exists in some biotypes. These biotypes will not be controlled by Iodosulfuron 10 WDG Herbicide. Consider using herbicides with other modes of actions such as 2,4-D to control these species.

Tank Mixes

Iodosulfuron 10 WDG Herbicide can be tank mixed with 2,4-D for enhanced burn down activity. Iodosulfuron 10 WDG Herbicide can also be tank mixed with glyphosate, Paraquat or Sencor®. For fields to be planted to corn, Iodosulfuron 10 WDG herbicide can be tank mixed with simazine. Refer to tank mix partner label for additional weeds and weed heights.

TANK CLEANUP PROCEDURE

1. Drain the tank completely, then wash out tank, boom, and hoses with clean water. Drain again.
2. Fill the tank half full with clean water and add ammonia (i.e. 3% domestic ammonia solution) at a dilution rate of 1% (i.e. 1 gallon of domestic ammonia for every 100 gallons of rinsate). Completely fill the tank with water. Agitate/recirculate and flush through boom and hoses. Leave agitation on for 10 minutes. Drain tank completely.
3. Repeat Step 2.
4. Remove nozzles and screens and soak them in a 1% ammonia solution. Inspect nozzles and screens and remove visible residues.
5. Flush tank, boom, and hoses with clean water. Inspect tank for visible residues. If present, repeat Step 2.

ROTATIONAL CROP DIRECTIONS

Iodosulfuron 10 WDG Herbicide rapidly degrades in the soil. This degradation is enhanced by warm moist soils that are microbially active. Rotational intervals to crops are illustrated below.

Crop	Rotational Interval
Alfalfa	18 months
Barley (Spring)	8 months
Barley (Winter)	4 months
Canola	18 months
Cotton*	9 months
Corn (field)	30 days
Corn (sweet, popcorn, corn grown for seed)	90 days
Dry Beans	18 months
Grain or Forage Sorghum	9 months
Oats	9 months
Peas, Snap Beans	18 months
Potatoes	18 months
Red Clover	18 months
Rice	18 months
Rye (winter)	4 months
Soybean	90 days
Sugarbeets	18 months
Sunflowers	18 months
Wheat (Spring)	8 month
Wheat (Winter)	4 months
All other crops	18 months

OTHER CROPS

All other crops may be seeded only after the completion of a successful field bioassay after an Iodosulfuron 10 WDG Herbicide application. Refer to the "Field Bioassay" section.

*East of Interstate 35, planting of cotton must wait 18 months when soil pH is greater than 7.5 and when less than 15" of annual precipitation has occurred following an application of Iodosulfuron 10 WDG Herbicide.

FIELD BIOASSAY

A field bioassay must be completed before rotating to crops other than those specified in the "Rotational Crop Directions" section of this label. To conduct an effective field bioassay, grow strips of the crop you intend to grow in the following season in a field previously treated with Iodosulfuron 10 WDG Herbicide. The test strip should include low areas and knolls, and include variations in soil such as type and pH. Crop response to the bioassay will determine if the crop(s) grown in the test strips can be grown safely in the areas previously treated with Iodosulfuron 10 WDG Herbicide.

RESISTANCE MANAGEMENT

Some weed populations may contain plants naturally resistant to Iodosulfuron 10 WDG Herbicide or other herbicides with the same mode of action (ALS/AHAS enzyme inhibitors). Repeated use of herbicides with the same mode of action allow resistant weeds to spread. To manage the development and spread of resistant weed populations, use herbicides with different modes of action in tank mixture, rotation, or in conjunction with alternate cultural practices.

USE RESTRICTIONS AND PRECAUTIONS

1. DO NOT apply more than a total of 0.001875 lbs active ingredient of Iodosulfuron per acre in a single calendar year. (Equivalent to 0.3 ounces of product).
2. Rainfall within 2 hours may result in reduced weed control. Established weeds should be actively growing when the herbicide application is made. Weed control may be reduced if application is made when weeds are dust covered or in the presence of heavy dew, fog, and mist/rain or when weeds are under stress due to drought.
3. DO NOT apply when wind causes drift to off-site vegetation, as injury may occur. Small amounts of Iodosulfuron 10 WDG Herbicide delivered via drift or spray tank combinations can damage other plants. Carefully manage spray drift and tank cleanout.
4. DO NOT apply this product by air or through any type of irrigation system.
5. Apply Iodosulfuron 10 WDG Herbicide spray mixtures within 24 hours of mixing to avoid product degradation.
6. DO NOT apply to soils with pH > 8.0
7. Do not use nitrogen solutions as spray carriers with Iodosulfuron 10 WDG Herbicide.
8. When this product is used as a post-harvest burndown application, no other product containing active ingredient Iodosulfuron may be applied for any other use in the same calendar year on the same acreage.
9. Do not make more than 1 application per year.
10. For sweet corn, popcorn, or corn grown for seed, use as a post-harvest burndown application in the fall at least 90 days prior to planting.

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 must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. 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 Bayer CropScience. All such risks shall be assumed by the user or buyer.

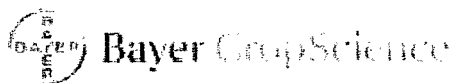
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NET CONTENT: 12 ounces

Balance, Buctril, Define, Liberty, Option, Radius and Sencor are registered trademarks of Bayer CropScience LP.

Produced for



Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
1-866-99BAYER (1-866-992-2937)

Iodosulfuron 10 WDG Herbicide (PENDING) 12/17/07