

02 DEC 1992

Willy Lin, Ph.D.
E. I. Du Pont de Nemours & Co., Inc.
P.O. Box 80038
Wilmington, DE 19880-0038

Dear Dr. Lin:

Subject: Du Pont Krenite® S Brush Control Agent
EPA Registration No. 352-395
Applications Dated November 10, 1992, Request
To Remove "Pine Plantations" and "Conifer
Plantations" Use Sites from the Labeling.
and To Add Claim that "Non-Food/Feed Crops
May Be Planted Anytime After Treatment"

The subject request to remove "Pine Plantations" and "Conifer Plantations" as use sites from the label needs to be clarified. As we understand this action, you wish to "cancel" the registration of these use sites. You should resubmit your application to make clear that this is your intent. There is a difference between removing use sites from a label and the cancellation of the use site registration. In the latter case, we are required to publish your request and wait a 90-day period to permit interested members of the public to intercede with you prior to the Agency approval of the deletion from registration, according to Section 6(f)(1) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended.

The subject proposed amendment to add the claim: "non-food/feed crops may be planted anytime after treatment" is acceptable for registration under FIFRA provided that you:

1. Name the non-food/feed crops that may be planted.
2. Delete the clause, "and other similar areas"; and list all use sites that you wish to claim on this label.
3. Add appropriate grazing restrictions that would be applicable to any of the use sites listed on this label.
4. Submit five (5) printed copies of the final label before releasing the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA,

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Section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely yours,

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

Enclosure

E. Wilson-Diskette #ABC1-11-30-92



KRENITE® S

BRUSH CONTROL AGENT

WATER SOLUBLE LIQUID

Contains 4 Lbs. Active Ingredient Per Gallon

ACTIVE INGREDIENT	BY WEIGHT
Ammonium salt of fosamine [ethyl hydrogen (aminocarbonyl) phosphonate].....	41.5%
INERT INGREDIENTS	58.5%
	TOTAL 100%

EPA Reg. No. 352-395

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REGISTRATION CODE 0392-000
PACKAGE SIZE 5 GALLON JUGS

KEEP OUT OF REACH OF CHILDREN

WARNING

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS 02 DEC 1992

WARNING! CAUSES EYE IRRITATION.

Do not get in eyes, on skin, or on clothing. Harmful if swallowed. Avoid breathing spray or mist.

STATEMENT OF PRACTICAL TREATMENT

If in eyes: flush with plenty of water for 15 minutes. Get medical attention if irritation persists.

If on skin: wash with plenty of soap and water.

If swallowed: drink promptly a large quantity of milk, egg white, gelatin solution, or, if these are not available, large quantities of water. Avoid alcohol.

For medical emergencies involving this product, call toll free 1-800-441-3637.

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 contaminate water when disposing of equipment washwaters.

ACCEPTED
with COMMENTS
in EPA Letter

Under the Fungicide, as amended, registered by the
352395

IMPORTANT

Do not use on food crops. Do not allow drift or spray mist to contact desirable trees, shrubs, or other plants, as injury may result. Keep from contact with fertilizers, insecticides, fungicides, and seeds.

Thoroughly clean all traces of "Krenite" S from application equipment after use. Flush tank, pump, hoses and boom with several changes of water after removing the nozzle tips and screens (clean these parts separately).

GENERAL INFORMATION

Du Pont "Krenite" S Brush Control Agent is a water soluble liquid to be diluted with water and applied as a foliar spray for control and/or growth suppression of many woody species. A spray directed to only part of susceptible brush species will provide control of the portion sprayed, resulting in a trimming effect. It is applied to brush during the period from full leaf in spring to first fall coloration. "Krenite" S treatment does not immediately affect treated woody plants; they remain green for the rest of the growing season. Treated susceptible plants fail to grow the next spring.

It is recommended for use on ^{only on} non-cropland, including highway rights-of-way, industrial plant sites, road rights-of-way, storage areas, utility and pipeline rights-of-way, ditch banks, and other similar areas. "Krenite" S is non-flammable and non-volatile.

Do not apply to open water (such as lakes, reservoirs, rivers, streams, creeks, salt water bays or estuaries) nor while water is present in fresh water wetlands (such as marshes, swamps, bogs or potholes) nor to salt water marshes within tidal areas nor to areas where the herbicide is likely to move into water. It is permissible to treat ditch banks, seasonally dry flood plains, deltas, marshes, swamps, bogs and transitional areas between upland and lowland sites.

Should treated areas be converted to cropland, do not plant to food crops within 1 year of treatment; however, non-food/feed crops may be planted anytime after treatment.

Not registered for sale or use in California or Arizona.

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There must be a no spraying statement associated with these uses.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

"Krenite" S Brush Control Agent should be used only in accordance with recommendations on this label, or in separate approved supplemental labeling available through your local "Krenite" S distributor or Du Pont representative.

Du Pont will not be responsible for losses or damages resulting from use of this product in any manner not specifically recommended by Du Pont. User assumes all risk associated with such non-recommended use.

Do not apply this product through any type of irrigation system.

GENERAL BRUSH CONTROL

Non-Cropland Areas

"Krenite" S at the following rates controls or suppresses undesirable brush/herbaceous plant species such as:

1/2 to 6 gal "Krenite" S per acre †

Bigleaf maple*	Leaky spurge**	Sweetgum
Birch	Loblolly pine	Thimbleberry
Blackberry	Persimmon*	Tuliptree (yellow
Black cherry*	Pin cherry	poplar)*
Blackgum*	Quaking aspen	Vine maple
Black locust	Red alder	Virginia pine
Bracken (fern)	Red maple*	Water oak
Chinese tallow	Red oak	White ash*
Chokecherry*	Salmonberry	White oak
Elm*	Sassafras*	Willow*
Hawthorn*	Sourwood*	
Hickory*	Sumac	

2 to 6 gal "Krenite" S per acre †

American elder	Field bindweed**	Tree-of-heaven
Basswood*	Multiflora rose	Wild grape
Eastern cottonwood	Slippery elm	Wild plum
Eastern white pine	Sycamore	Winged elm*

*Partial control and growth suppression.

**Apply "Krenite" S after plants begin to bloom.

† Do not apply more than 3 gal. "Krenite" S per acre for aerial treatment.

SPRAY PREPARATION

Measure the proper amount of "Krenite" S and use agitation to thoroughly mix into the necessary volume of water. To enhance the activity of the "Krenite" S treatment, the addition of 1/4% (by volume) of a non-phytotoxic superior-type (60-70 second viscosity) oil as the last ingredient may be desirable in some areas. (Consult local sales personnel). After "Krenite" S has been thoroughly mixed in the spray tank, agitation of the spray solution is not required.

SPRAY APPLICATION METHODS

Before applying, properly calibrate spray equipment. For woody plant control, make a single foliar application of the recommended rate of "Krenite" S during the period from full leaf in spring to first fall coloration. For control of only a portion of a plant, as in trimming, direct the spray to thoroughly cover only the section of the plant to be controlled. Use the highest recommended rate on stands in which species partially controlled and suppressed are dominant.

For high volume treatment (ground equipment) prepare a spray solution using 1 1/2 to 3 gallons "Krenite" S per 100 gallons of water. Do not prepare less than a 1 1/2% solution or exceed 6 gals. "Krenite" S per acre. Apply a quantity of spray solution which will thoroughly and uniformly cover the target brush without causing unnecessary run-off. Spray pressure at nozzles should be 100 to 300 psi. Total rate and volume per acre will depend on plant species, height and density of growth and on type of equipment used. On tall dense brush, it is often necessary to spray from both sides to obtain adequate coverage.

For low volume treatment (ground equipment) use airblast equipment such as a "Solo backpack mist blower", prepare a spray solution using 1-1/2 to 3 gallons "Krenite" S per 10 gallons of water. Apply a quantity of spray solution using equipment which will assure particle breakup and uniform coverage of the low spray volumes applied, without causing unnecessary run-off. Total rate and volume per acre will depend on plant species, height and density of growth, and on type of equipment used.

For aerial treatment, apply 1 1/2 to 3 gals of "Krenite" S per acre using 10 to 40 gallons of water to thoroughly and uniformly cover the target brush without causing unnecessary run-off. Total rate and volume per acre will depend on plant species, height and density of growth, and on type of equipment used. If foaming is encountered, use an anti-foam agent.

Note: Effectiveness may be reduced if, following treatment, rainfall occurs on the same day. Do not cut treated brush until stems are dead, or sprouting may occur.

STORAGE AND DISPOSAL

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

PRODUCT DISPOSAL: Do not contaminate water, food, or feed by storage or 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) the container. 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.

NOTICE OF WARRANTY

Du Pont warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risks inherently 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 Du Pont. In no case shall Du Pont be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by the Buyer. DU PONT MAKES NO WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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