

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

yellow

PM-23

Reg # 352-395

199

JAN 22 1996

Mr. Richard M. Vaught
 E.I. du Pont de Nemours & Co.
 Walker's Mill, Barley Mill Plaza
 P.O. Box 80038
 Wilmington, DE 19880-0038

SUBJECT: Label Amendment: Deletion of Ditchbank Use; Limitation of Maximum Use Rate to Side Trimming Work; Addition of Spray Drift Management Section; Reformatting.

DuPont Krenite S Brush Control Agent (Main and Supplemental Label); DuPont Krenite UT Brush Control Agent (Main Label).

EPA Registration No. 352-395

Your Submissions Dated June 23, 1995 and Correction for Krenite UT Brush Control Agent, dated September 25, 1995.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Add the statement "Do not apply this product through any type of irrigation system" near the beginning of the Directions For Use section of the main product label (for both Krenite S and Krenite UT).

Stamped copies of the Krenite S labels (main and supplemental) are enclosed for your records. Please submit one copy of the final printed labels before you release the product for shipment. A stamped copy of the Krenite UT label was sent to you prematurely on October 18, 1995, due to an Agency error. You should revise the Krenite UT label in accordance with item 1, above, at the next label printing and submit one copy of the final printed label to the Agency at that time.

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #2:S490002.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jan 22, 1996							

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The Reregistration Eligibility Decision (RED) for Fosamine Ammonium, issued in January, 1995, includes additional end-use product labeling requirements with which you must comply. We note that you have submitted an Application for Reregistration (or "8-Month Response") to comply with the RED. You will be notified of the Agency's reregistration determination for the subject product once review of your application is completed.

Sincerely yours,

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

Enclosures

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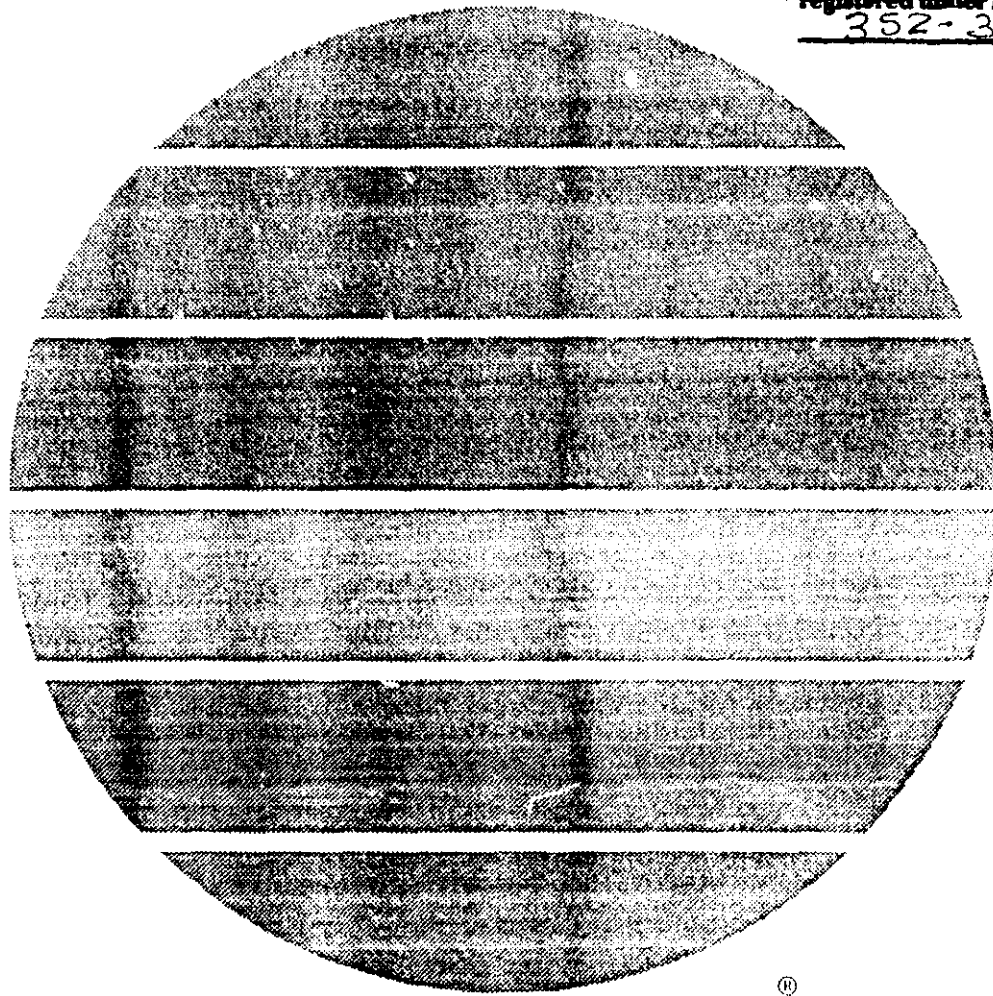
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Krenite[®] S

brush control agent

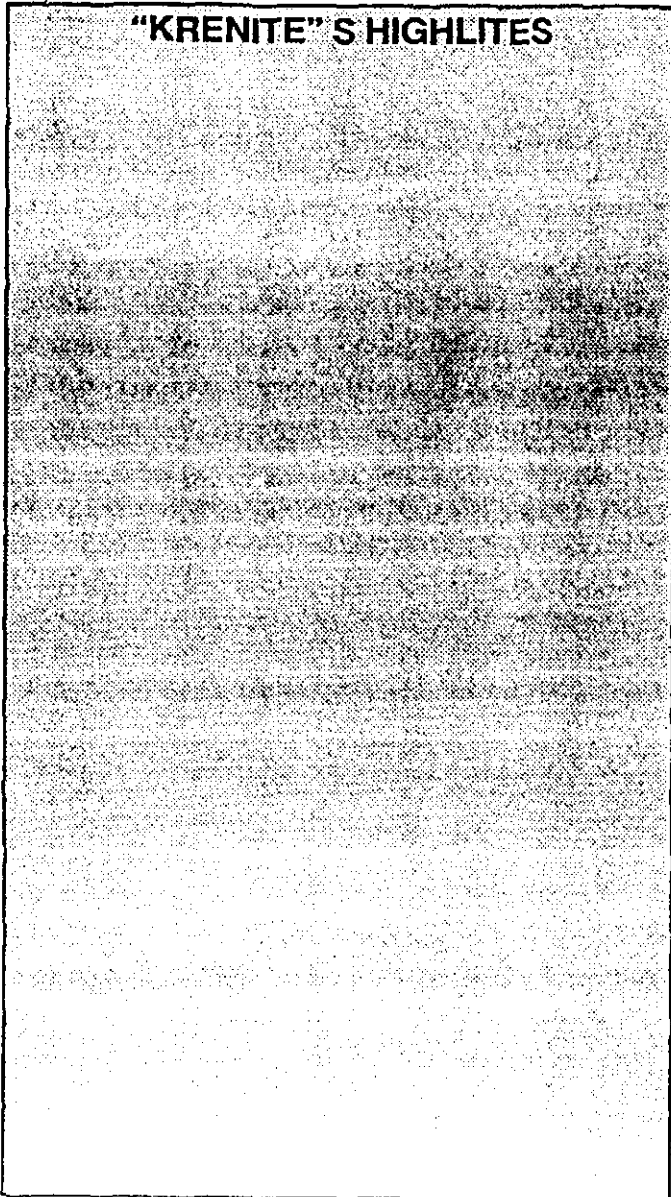
ACCEPTED
with COMMENTS
In EPA Letter Dated
JAN 22 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
352-395



"..... A Growing Partnership With Nature"

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"KRENITE" S HIGHLITES

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Krenite® S

brush control agent

Water Soluble Liquid

Contains 4 Lbs. Active Ingredient Per Gallon

<i>Active Ingredient</i>	<i>By Weight</i>
Ammonium salt of fosamine [ethyl hydrogen (aminocarbonyl) phosphonate]	41.5%
<i>Inert Ingredients</i>	58.5%
TOTAL	100%

EPA Reg. No. 352-395

KEEP OUT OF REACH OF CHILDREN

WARNING

PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS
AND DOMESTIC ANIMALS**

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.

DIRECTIONS FOR USE

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

KRENITE S should be used only in accordance with recommendations on this label or in separate published DuPont recommendations available through local suppliers.

Do not use on food or feed crops.

GENERAL INFORMATION

DuPont 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 suppression of many woody species.

KRENITE S is recommended for use on noncropland, including highway rights-of-way, industrial sites, railroad rights-of-way, storage areas, utility and pipeline rights-of-way.

It is permissible to apply to floodplains where surface water is not present, terrestrial areas of deltas and low lying areas where water is drained but may be isolated in pockets due to uneven or unlevel conditions.

KRENITE S is non-flammable and non-volatile.

ENVIRONMENTAL CONDITIONS AND BIOLOGICAL ACTIVITY

A KRENITE S spray directed to only part of susceptible brush species will provide control of the portion sprayed, resulting in a trimming effect. Treatment with KRENITE S generally does not immediately affect treated woody plants; they retain normal foliage for the remainder of the growing season. Treated susceptible plants fail to grow the following spring.

Effectiveness may be reduced if, following treatment, rainfall occurs on the same day.

APPLICATION INFORMATION

NONCROPLAND, INDUSTRIAL SITES

KRENITE S is recommended for the control and suppression of undesirable woody plants in noncropland and industrial areas.

Application Timing

Make a single foliar application of the recommended rate of KRENITE S during the period after spring growth has hardened to the development of fall coloration on deciduous species.

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Species Controlled

KRENITE S effectively controls or suppresses the following plants when applied at the use rates shown.

1 1/2 to 6 gal KRENITE S per acre

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

2 to 6 gal KRENITE S per acre

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

** Partial control and growth suppression.

*** Make applications after plants begin to bloom.

SPRAY EQUIPMENT

KRENITE S may be applied using high volume or low volume ground sprayers as well as aircraft (helicopter only). Application equipment should not be used for application to crops following an application of KRENITE S.

Application equipment should be properly calibrated before making applications of KRENITE S.

HIGH VOLUME GROUND APPLICATION

Prepare a spray solution using 1 1/2 to 3 gallons of KRENITE S per 100 gallons of water. Apply a quantity of spray solution which will thoroughly and uniformly cover the foliage without causing unnecessary run-off. Total rate and volume per acre will depend on plant species, height and density of growth as well as the type of application equipment used. On tall or dense stands of brush it may be necessary to spray from opposite sides in order to obtain thorough coverage of the foliage. Use the higher rates on stands in which difficult to control species are dominant.

Do not apply more than 4 gallons of KRENITE S per acre.

LOW VOLUME GROUND APPLICATION

Prepare a spray solution using 1 1/2 to 3 gallons of 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 foliage. Total rate and volume per acre will depend on plant species, height and density of growth as well as the type of application equipment used. Use the higher concentrations on stands in which difficult to control species are dominant.

Do not apply more than 4 gallons of KRENITE S per acre.

AERIAL APPLICATION

Prepare a spray solution using 1 1/2 to 3 gallons of KRENITE S in 10 to 40 gallons of water. Use sufficient spray solution to uniformly and thoroughly cover the foliage without causing unnecessary runoff. Total rate and volume per acre will depend on plant species, height and density of growth. Use the higher concentrations on stands in which difficult to control species are predominant.

Do not apply more than 3 gallons of KRENITE S per acre when using aerial equipment.

SIDE TRIMMING

For control of only a portion of a plant, direct the spray solution to thoroughly cover only the portion of the plant to be controlled. Application methods described above may be used for side trimming.

Do not apply more than 6 gallons of KRENITE S per acre when side trimming.

SPRAY ADJUVANTS

To enhance the activity of the KRENITE S treatment, the addition of a non-phytotoxic superior-type (60 to 70 second viscosity) oil as the last ingredient may be desirable. The oil should be mixed in the spray solution at a minimum concentration of 1/4% by volume (1 quart per 100 gallons) or at the manufacturer's recommended dosage.

If foaming is a problem during mixing, an anti-foam agent may be added.

MIXING INSTRUCTIONS

1. Fill spray tank 1/2 full of water.
2. With the agitator running, add the desired amount of KRENITE S.
3. If using a companion product, add the recommended amount.
4. Add spray adjuvants if any are to be used.
5. Add the remaining water.
6. Agitate the spray solution thoroughly.

After KRENITE S has been thoroughly mixed in the spray tank agitation of the spray solution is not required.

SPRAYER CLEANUP

Thoroughly clean all mixing and spray equipment immediately following applications of KRENITE S. Flush tank, pump, hoses and boom with several changes of water after removing the nozzle tips and screens (clean these parts separately).

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SPRAY DRIFT MANAGEMENT

The interaction of many equipment and weather-related factors determines the potential for spray drift. The applicator is responsible for considering all of these factors when making applications.

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR.

IMPORTANCE OF DROPLET SIZE

The most effective way to reduce drift potential is to apply large droplets (>150-200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. **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 sections of this label.

Controlling Droplet Size--General Techniques

- Volume -Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure -Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER - CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- 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.

WIND

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given wind speed. **AVOID GUSTY OR WINDLESS CONDITIONS.**

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 hot and dry conditions, set up equipment to produce larger droplets to reduce effects of evaporation.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature 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 or an aircraft smoke generator. Smoke that layers in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

PRECAUTIONS

- Cutting of treated stems of brush before they are completely dead may result in sprouting.
- Do not use on lawns, walks, driveways, tennis courts or similar areas.
- Do not apply in or on irrigation or drainage ditches or canals, including their outer banks.
- Should treated areas be converted to cropland, do not plant to food crops nor graze livestock within 1 year of treatment; however non-food/feed plants such as wildflowers and native grasses may be planted anytime after treatment on the sites listed.
- Drift or spray mist contact with desirable trees, shrubs, or other plants may result in injury.
- Not registered for sale or use in California or Arizona.

STORAGE AND DISPOSAL

STORAGE: Store product in original container only. Do not contaminate water, other pesticides, fertilizer, food or feed in storage.

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.

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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. 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 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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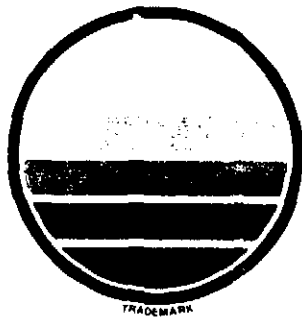
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DuPont Agricultural
Products

"..... A Growing Partnership With Nature"



KRENITE® S
BRUSH CONTROL AGENT

KRENITE® S BRUSH CONTROL AGENT

EPA REG. NO. 352-395

"KRENITE" S BRUSH CONTROL AGENT TANK MIXES WITH ARSENAL

DIRECTIONS FOR USE

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

DuPont KRENITE S Brush Control Agent plus "Arsenal" is recommended as a tank mix for improved control of ash, maple, boxelder, elm, sassafras, black cherry, hackberry, willow, persimmon, blackgum, wild pecan and dogwood on noncropland areas such as railroad, utility and pipeline rights-of-way, utility plant sites, petroleum tank farms, pumping installations, fence rows, storage areas, and other similar areas. Do not use on non-cropland adjacent to and surrounding domestic water supply reservoirs, supply streams, lakes and ponds.

HOW TO USE

Apply 1-1/2 gallons KRENITE S plus 1/2 to 1 pint "Arsenal"* per 100 gallons and spray to run-off. Apply from full leaf in spring to first fall coloration.

To minimize off-right-of-way effects, (1) do not use for trimming of trees along rights-of-ways, and (2) use the 1/2 pint rate of "Arsenal" in the combination near desirable trees.

*Product containing 2 lbs active per gallon.

Note: Do not apply directly to any body of water. Not Registered in California or Arizona.

IMPORTANT

BEFORE USING "KRENITE" S OR ARSENAL, READ AND FOLLOW ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS ON THE EPA-REGISTERED LABEL.

This bulletin contains new or supplemental instructions for use of these products which do not appear on the EPA-registered package labels. Follow the instructions carefully.

This labeling must be in the possession of the user at the time of pesticide application.

† Registered trademark of American Cyanamid Company

D-061295 (Replaces H-32310)

**ACCEPTED
with COMMENTS
In EPA Letter Dated
JAN 22 1996**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
352-395**