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352-445

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

MAY 21 1997

OFFICE OF
PREVENTION PESTICIDES AND
TOXIC SUBSTANCES

Ms Hanan N Ghanous
Product Registration Manager
Dupont Agricultural Products
Registration & Regulatory Affairs
Walker's Mill, Barley Mill Plaza
P O Box 80038
Wilmington, DE 19880-0038

Subject Response To Letter Of May 6, 1997
Request For Approval Of Supplemental Labeling For
For Both Dupont Glean FC Herbicide (EPA Reg No 352-522)
And Dupont Finesse Herbicide (EPA Reg No 352 445)
To Reduce Rotation Interval For Grain Sorghum, and Add STS
Soybeans And IR Corn

For Dupont Ally Herbicide (EPA Reg No 352-435)
To Reduce Rotation Interval For Grain Sorghum and Add STS
Soybeans, IR Corn, And Proso Millet

Dear Ms Ghanous,

The amendments referred to above, requests for decreasing the plant-back intervals for grain sorghum, and adding plant back intervals for STS soybeans, IR corn, and proso millet, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, have been completed. The review of your confine accumulation study (MRID #403578-04, Dupont Report No AMR-798-87, 3/12/87) has been completed. Your supplemental label requests are discussed separately under each product

Glean FC Herbicide (EPA Reg No 352-522) Chlorsulfuron and
Finesse Herbicide (EPA Reg No 352-445) - Chlorsulfuron and
Metsulfuron Methyl

Your request for the supplemental labels to decrease the plant back interval to 4 months for grain sorghum, and add STS soybeans and IR corn with a 4 month plant-back interval is approved with the following comments

- 1 Define STS soybeans and IR corn on the supplemental label
- 2 Change the heading in the second column above the plant back table from 'Non Cereal Crops-Rotation Intervals-Irrigated/Non Irrigated Land-Grain Sorghum, STS Soybeans, IR Corn' to 'Rotation Intervals For Non Cereal Crops - Grain Sorghum, STS Soybeans IR Corn -Irrigated/Non

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Irrigated Land Following Wheat, Barley or Fallow Land at the Maximum Use Rates Listed in the Following Table'

Ally Herbicide (EPA Reg. No. 352-435):

Your request for a supplemental label to decrease the plant-back interval to 4 months for grain sorghum, and add a plant-back interval of 4 months for STS soybeans, IR corn, and proso millet is approved with the following comment:

1. Define STS soybeans and IR corn on the supplemental label.
2. Change the heading in the second column above the plant-back table from 'Non Cereal Crops-Rotation Intervals-Irrigated/Non Irrigated Land-Grain Sorghum, STS Soybeans, IR Corn, Proso Millet' to 'Rotation Intervals For Non Cereal Crops - Grain Sorghum, STS Soybeans, IR Corn, Proso Millet - Irrigated/Non Irrigated Land Following Wheat, Barley or Pastures at the Maximum Use Rates Listed in the Following Table'

Provide us with one (1) copy of your final printed labels with the changes discuss above for each product before you release the products for shipment.

A stamped copy of the labels are enclosed for your records.

Sincerely yours,



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

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ACCEPTED
with COMMENTS
In EPA Letter Dated
DuPont Agricultural Products
5/21/97



FINESSE® HERBICIDE

ROTATION INTERVAL
TO GRAIN SORGHUM,
STS SOYBEANS, IR CORN

REC
MAY 12 AM 1:18
/DPDI

FINESSE® HERBICIDE

EPA REG. NO. 352-445

**ROTATION INTERVAL TO GRAIN SORGHUM,
STS SOYBEANS, IR CORN**

DIRECTIONS FOR USE

This product is a water dispersible granule containing 75% active ingredient by weight.

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

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.

CROP ROTATION

Minimum Rotation Intervals

Minimum rotation intervals* are determined by the rate of breakdown of FINESSE applied. FINESSE breakdown in the soil is affected by soil pH, soil temperature, soil microorganisms, and soil moisture. Low soil pH, high soil temperature, and high soil moisture increase FINESSE breakdown in soil, while high soil pH, low soil temperature, and low soil moisture slow FINESSE breakdown.

Of these three factors, only soil pH remains relatively constant. Soil temperature, and to a greater extent, soil moisture, can vary significantly from year to year and from area to area. For this reason, soil temperatures and soil moisture should be monitored regularly when considering rotating to other crops.

Soil pH Limitations

FINESSE should not be used on fields having a soil pH above 7.9, as extended soil residual activity could extend crop rotation intervals beyond those specified in the rotation table, and under certain conditions, could injure wheat or barley. In addition, other crops planted in high-pH soils can be extremely sensitive to low concentrations of FINESSE.

FINESSE should not be used on soils with a pH below 5.0, as additional crop stress from low pH and aluminum toxicity may result in crop injury.

Before using FINESSE, determine the soil pH of the field. To obtain a representative pH value, take several samples from different areas of the field between 0" and 4" deep and analyze them separately. Consult local extension publications for additional information on recommended soil sampling procedures. Before using FINESSE, carefully consider your crop rotation plans and options. For rotational flexibility, do not treat all of your wheat, barley, or fallow acres at the same time.

Non Cereal Crops—Rotation Intervals—Irrigated/Non Irrigated Land - Grain Sorghum, STS Soybeans, IR Corn

Areas	Crop	Soil pH	Maximum Rotation	
			Use Rate (oz/acre)	Interval (months)*
All Areas of TX, OK, KS NE and CO	STS	7.5 or lower	0.4	4**
	Soybeans	lower		
	IR Corn			
Panhandles of Texas and Oklahoma, West of Hwy 183 in Kansas and Nebraska, and all of Colorado	Grain Sorghum	7.2 or lower	0.3	4**
		7.3-7.5	0.3	6**
All Other areas of TX, OK, KS, and NE	Grain Sorghum	7.5 or lower	0.4	4

*The minimum rotation interval represents the period of time from the last application to the anticipated date of the next planting. Rotation intervals are based on normal precipitation/irrigation amounts, see "Catastrophic crop loss" section for additional details. See EPA approved FINESSE label for additional details on crop rotation recommendations and restrictions.

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****WHERE A CATASTROPHIC CROP LOSS HAS OCCURRED AFTER FINESSE APPLICATION DUE TO A NATURAL DISASTER** (such as late freezing weather, hail damage, insect damage, disease damage) grain sorghum can be replanted at 4 months where the soil pH is 7.3-7.5, and STS Soybeans and IR Corn where the soil pH is 7.5-7.9. These crops will have some level of temporary discoloration and/or crop injury planted at this reduced interval after FINESSE application. This potential damage and yield loss is accepted by the grower due to the critical need to get a crop planted after this emergency. Growers not willing to accept this level of potential early season crop injury and yield loss should follow the standard rotational guidelines in the table above.

In some cases, this injury may be severe and may affect the crop growth, development, and yield. The severity of the injury increases with higher pH levels, higher applied FINESSE rate, drier soil conditions after FINESSE application and prior to planting the rotational crop, and the shorter the rotational interval.

DuPont recommends that you first consult your state experiment station, university, extension agent, or local crop consultant as to agronomic practices that may help minimize this crop injury. A current soil analysis report of the affected area is recommended to determine the actual level of risk in the field.

IMPORTANT PRECAUTIONS

- Injury to or loss of desirable trees or vegetation may result from failure to observe the following:
 - Do not apply, drain or flush equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
 - Do not use on lawns, walks, driveways, tennis courts or similar areas.
 - Prevent drift of spray to desirable plants.
- Do not contaminate any body of water. Thoroughly clean application equipment immediately after use
- Finesse is non-corrosive, non-flammable, non-volatile, and does not freeze in storage.
- Under certain conditions (such as drought, prolonged cold weather, pH variability in the fields) temporary discoloration and/or crop injury may occur to sorghum, STS soybeans, and IR corn planted after FINESSE applications.
- This supplemental label does not apply to crops grown for seed.

IMPORTANT BEFORE USING FINESSE, READ AND FOLLOW ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS ON THE EPA-REGISTERED LABEL.

This bulletin contains new or supplemental instructions for use of this product which do not appear on the EPA-registered package label. Follow the instructions carefully.

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

D-050597