

524-350

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1/9



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

OCT 30 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Stephen J. Wratten
Monsanto Company
600 13th Street, NW, Suite 660
Washington, DC 20005

Dear Mr. Wratten:

Subject: Polado L Growth Regulator (Revise Label)
EPA Registration No. 524-350
Application Dated August 13, 2003

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. Within the list of PPE for early re-entry in the Agricultural Use Requirements box, revise the requirement for "waterproof gloves" to a requirement for "chemical-resistant gloves made of any waterproof material."
2. Revise the second sentence of your Environmental Hazards section to read "Do not contaminate water when **cleaning equipment** or disposing of equipment washwaters."
3. In your Storage and Disposal section revise "Storage" to read "Pesticide Storage", revise "Disposal" to read "Pesticide Disposal" and add the heading "Container Disposal".

Submit three (3) copies of your final printed labeling before you release the product for shipment. Amended labeling supercedes all previously accepted ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

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

2/9

ACCEPTED
with COMMENTS
In EPA Letter Dated

OCT 30 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this product is
registered under EPA Reg. No. 524-350

Polado® L

Plant Growth Regulator by Monsanto

For use only on sugarcane.

For foliar application to hasten ripening and extend the period of high sucrose levels in sugarcane.

Complete Directions for Use

® Registered trademark of Monsanto Company

EPA Reg. No. 524-350

[Insert Date]

[Insert Print Plate]

Read the entire label before using this product.

Use only according to label instructions.

Read "LIMIT OF WARRANTY AND LIABILITY" before buying or using. If terms are not acceptable, return at once unopened.

THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

LIMIT OF WARRANTY AND LIABILITY

This Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, other tort or otherwise.

Buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, application to or contact with desirable vegetation, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set

forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop or treated vegetation.

THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Keep out of reach of children.

CAUTION!

In case of emergency involving this product, Call Collect, day or night, (314) 694-4000.

Personal Protective Equipment (PPE)

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

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.

User Safety Recommendation:

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.

Do not apply to any crops other than sugarcane.

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

Rainfall within 6 hours after application may reduce effectiveness. Use of this product in any manner not consistent with this label may result in injury to persons, animals or crops, or other unintended consequences.

Within 2 to 3 weeks after application, this product may produce a slight yellowing to pronounced browning and drying of leaves, and a shortening of upper internodes. Spindle death may occur.

Most of the sucrose increase is concentrated in the top nodes of the treated cane stalk. In order to recover the maximum sugar where topping is practiced during harvest, top at the base of the fourth leaf.

Prior to application, consult your state sugarcane authority or local Monsanto representative regarding the degree of sucrose response anticipated from the variety of sugarcane to be treated. Do not plant subsequent crops in treated fields other than the following for 30 days after application: alfalfa or other forage legumes, beans (all types), corn (all types), cotton, melons (all types), pasture grasses, peanuts, potatoes (Irish or sweet), sorghum (milo), soybeans, squash (all types) or wheat.

PRECAUTIONS, RESTRICTIONS: Application of this product may initiate development of shooting eyes.

This product may not increase the sucrose content of sugarcane under conditions of good natural ripening.

Do not apply to sugarcane to be harvested for seed purposes.

Do not feed or graze treated sugarcane forage following application.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any 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 regulations.

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

6/9

equipment (PPE) and restricted-entry interval. 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 4 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, waterproof gloves, and shoes plus socks.

For more product information, call toll-free 1-800-332-3111.

Storage and Disposal

Do not contaminate water, foodstuffs, seed or feed by storage or disposal.

STORAGE:

When not in use, keep container closed to prevent spills and contamination.

STORE ABOVE 10°F. (-12°C.) TO KEEP FROM CRYSTALLIZING.

Crystals will settle to the bottom. If allowed to crystallize, place in a warm room at 68°F. (20°C.) for several days to redissolve and mix well before using.

DISPOSAL:

Wastes resulting from the use of this product that cannot be used or chemically reprocessed should be disposed of in a landfill approved for pesticide disposal or in accordance with applicable Federal, state or local procedures.

Emptied container retains vapor and product residue. Observe all labeled safeguards until container is destroyed. Do not reuse container, destroy when empty.

Triple rinse container, then 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.

Mixing And Application Instructions

APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.

Mix only with clean water.

NOTE: REDUCED RESULTS MAY OCCUR IF WATER CONTAINING SOIL IS USED, SUCH AS WATER FROM PONDS AND UNLINED DITCHES.

MIXING:

7/9

This product mixes readily with water. Mix spray solutions of this product as follows: fill the mixing or spray tank with the required amount of water while adding the recommended amount of this product. Remove hose from tank immediately after filling to avoid siphoning back into the carrier source.

APPLICATION EQUIPMENT AND TECHNIQUES:

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

This product may be applied with the following application equipment:

Aerial—Fixed Wing and Helicopter

Ground Broadcast Spray—Boom or boomless systems, pull-type sprayer, floaters, pick-up sprayers, spray coupes and other ground broadcast equipment.

AERIAL SPRAY DRIFT MANAGEMENT:

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops.

1. The distance of the outermost nozzles on the boom must not exceed 3/4 the length of the wingspan or rotor.
2. Nozzles must always point backward, parallel with the air stream and never be pointed downwards more than 45 degrees. Where states have more stringent regulations, they should be observed.

Importance of 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 the "Wind", "Temperature and Humidity" and "Temperature Inversions" sections of this label).

Controlling Droplet Size

- **Volume:** Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with the 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 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 backwards, parallel to the air stream, will produce larger droplets than other orientations. Significant deflection from the 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 larger droplets than other nozzle types.
- **Boom length:** For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

- **Application height:** Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces the exposure of the droplets to evaporation and wind.

Swath Adjustment

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

Wind

Drift potential is lowest between wind speeds of 2 to 10 miles per hour. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 miles per hour due to variable wind direction and high inversion potential. **NOTE:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect 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.

Temperature Inversions

Applications should not occur during a temperature inversion because drift potential is high. 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 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 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.

Sensitive Areas

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

Avoid direct application to any body of water.

AIRCRAFT MAINTENANCE:

Thoroughly wash aircraft, especially landing gear, after each day of spraying to remove residues of this product accumulated during spraying or from spills. **PROLONGED EXPOSURE OF THIS PRODUCT TO UNCOATED STEEL SURFACES MAY RESULT IN CORROSION AND POSSIBLE FAILURE OF THE PART. LANDING GEAR IS MOST SUSCEPTIBLE.** The maintenance of an organic coating (paint), which meets aerospace specification MIL-C-38413, may prevent corrosion.

APPLICATION RATES:

See the following use instructions for recommended rates and time of application for the state in which applications are to be made.

9/9

NOTE: Use the higher rate within the recommended range when treating sugarcane under adverse ripening conditions or when less responsive varieties are to be treated.

FLORIDA -- Apply 6 to 14 fluid ounces of this product per acre 3 to 5 weeks before harvest of LAST RATOON CANE ONLY.

HAWAII -- Apply 10 to 24 fluid ounces of this product per acre 4 to 10 weeks before harvest.

LOUISIANA -- Apply 4 to 14 fluid ounces of this product per acre 3 to 7 weeks before harvest of RATOON CANE ONLY.

PUERTO RICO -- Apply 6 fluid ounces of this product per acre 3 to 5 weeks before harvest of RATOON CANE ONLY.

TEXAS -- Apply 6 to 14 fluid ounces of this product per acre 3 to 5 weeks before harvest of RATOON CANE ONLY.

No license granted under any non-U.S. patent (s).

EPA Reg. No. 524-350

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MONSANTO COMPANY
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