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



OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

MAR 1 5 2007

Ms. Julie Butcher Gowan Company P. O. Box 5569 Yuma, AZ 85366-5569

Dear Ms. Butcher:

Subject: Sandea Herbicide (Add Alfalfa) EPA Registration No. 10163-254 Letter Dated October 20, 2004

The amendment referred to above, submitted in connection with registration under Section 3(c)(7)(B) of the Federal Insecticide, Fungicide, and Rodenticide Act a (FIFRA), will be acceptable provided that you agree in writing that:

- 1. You will submit avian reproduction studies in bobwhite quail and mallard duck within two (2) years from the date of this letter.
- 2. You will submit/cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
- 3. You will submit production information (pounds or gallons produced) for the fiscal year in which the use on <u>alfalfa</u> is conditionally registered, in accordance with FIFRA section 29. The production information will be submitted to the Agency no later than November 15, following the end of the preceding fiscal year.

This information should be submitted to:

Mr. Owen F. Beeder U.S. Environmental Protection Agency Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Avenue Washington, DC 20004

- 4. You will make the following label changes to your master/packaging label before you release the product for shipment bearing the amended labeling:
- a. Add the statement "This product is toxic to non-target vascular plants" to the Environmental

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Hazards section of your master label. This statement must also be added to the Environmental Hazards section of any registered manufacturing use products containing halosulfuron.

- b. Add the following statements to the Spray Drift Management section of your label.
 - 1. Do not allow this product to drift onto neighboring crops or non-crop area or use in a manner or at a time other than in accordance with label directions because animal, plant or crop injury, illegal residues or other undesirable results may occur.
 - 2. Under Spray Drift Management the first paragraph, add the statement "Where states have more stringent regulations, they should be observed.", immediately after the statement "The applicator and the grower are responsible for considering all these factors when making decisions."
- 5. Please submit five copies of revised master labeling incorporating the above changes for our review and stamping, before your next printing.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6 (e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions.

A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into master labeling and copies of master labeling submitted to the Agency for our files at your next printing or within two years from the date of acceptance supplemental labeling, whichever comes first. The Agency will consider a convincing argument as to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

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

Supplemental Labeling



Sandea[®] is a selective herbicide for control of listed weeds including nutsedge. EPA REG. No. 10163-254

KEEP OUT OF REACH OF CHILDREN CAUTION

- This labeling must be in the possession of the user at the time of pesticide application.
- . It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
- · All applicable directions, restrictions and precautions on the EPA registered label are to be followed.

PREHARVEST INTERVAL

The required days between last application and harvest are given in () after each crop name.

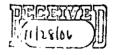
APPLICATION RATES AND TIMING

CROP	OZ/ACRE	COMMENTS
ALFALFA (14)	2/3 -1	Established Fields
CA & AZ Only		 Post Emergence Broadcast Sandea can be applied as a broadcast application to established alfalfa. Alfalfa should be well established in the field for a minimum of 6 months prior to application of Sandea. Apply uniformly with ground equipment in a minimum of 20 gallons of water per acre. Use a water volume that will provide uniform coverage of plants. It is recommended to make an application as soon as possible after removal of hay from the field and prior to an irrigation to minimize crop injury. Wait for at least 48 hours after application before irrigation.
		Post Emergence Spot Treatment – Sandea can be applied as a spot treatment application to only those areas of emerged nutsedge. Application rate should not exceed 3/4 oz product per treated acre in these areas. Use a water volume that will allow for good coverage of the plants.
		 Post Emergence followed by Post Emergence - To maximize control of nutsedge, it may be necessary to use a second post emergence spot application to those areas where the nutsedge has emerged or re-grown. For these situations, use a spot treatment method treating only those areas of emerged nutsedge. Application rate should not exceed 3/4 oz product per treated acre in these areas. Use a water volume that will allow for good coverage of the plants. This use pattern will result in greater potential of growth and yield reduction.
		Research has shown that alfalfa growth and yields will be reduced for one or more cuttings after a Sandea Herbicide application. Application of Sandea to alfalfa where re-growth exceeds 6" will result in greater yield reduction. Symptoms may be temporary. Follow all directions carefully to minimize potential reduced plant growth and yield. Apply uniformly with ground equipment in a minimum of 20 gallons of water per acre. Use a water volume that will provide uniform coverage of plants.
		apply more than 2 ounces of Sandea per acre per crop cycle, not to exceed 2 ounces per acre per 12-month period. It "Use Precautions" and "For Optimum Results" sections for important usage information.

ACCEPTED with COMMENTS In EPA Letter Dated:

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Under the Federal Insecticide, Fungicide, and Rodenticide Act, as an'unded, for the posticide registered under EPA Reg. Ro. EPA Text Pending: Sandea Alfalfa Supplemental (revised to EPA 11-28-06)





Produced For; Gowan Company P.O. Box 5569 Yuma, Arizona 85366-5569