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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Ms. Luz G. Chan Registration Manager Drexel Chemical Company P.O. Box 13327 Memphis, TN 38113-0327

MAR - 3 2004

Dear Ms. Chan:

Subject: Drexel Me-Too-Lachlor Herbicide EPA Registration No. 19713-548

Application and Letter Dated January 9, 2004, Request To Amend Registration To Add Use Cite, Sorghum (Grain and Forage) Under Supplemental Labeling

The subject application to amend the registration of "Drexel Me-Too-Lachlor Herbicide" under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has been reviewed and found acceptable, provided that you:

- 1. Under the section "Pre-plant Surface Applied", correct the typographic error in the first sentence by deleting "the of".
- 2. Under the section "Gramoxone Extra" section correct the dosages to read: "1.5 to 2.2 to 2.5, or 2.5 to 3 pts/A to 1 to 3, 3 to 6, or 6-inch tall weeds, respectively."
- 3. Submit one (1) copy of the final printed label prior to your shipment of this pesticide product under the enclosed revised Supplemental Labeling.

If these conditions are not complied with, the registration will be subject to cancellation in a accordance with FIFRA section 6(e). Your release for shipment of the product under the enclosed stamped copy of the label constitutes acceptance of these conditions.

Sincerely yours,

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

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ACCEPTED with COMMENTS in EPA Letter Dated MAR - 3 2004

SUPPLEMENTAL LABELING

Drexel

Under the Federal Insecticide, Pungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

19713-548

Me-Too-Lachlor

Herbicide

(EPA Reg. No. 19713-548)

FOR USE IN SORGHUM (GRAIN OR FORAGE) SEED TREATED WITH CONCEP® OR SCREEN®

PEAD THE ENTIRE DREXEL ME-TOO-LACHLOR HERBICIDE LABEL BEFORE PROCEEDING
WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL

KEEP OUT OF REACH OF CHILDREN

CAUTIONDIRECTIONS FOR USE

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

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

All applicable directions, restrictions and use precautions on Drexel ME-TOO-LACHLOR HERBICIDE label(s) are to be followed. This labeling contains supplemental instructions and restrictions for use of this product which may not appear on the Drexel ME-TOO-LACHLOR HERBICIDE label. Follow the instructions carefully.

-- 548SUPP-0104++ Pending

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SORGHUM (GRAIN OR FORAGE) SEED TREATED WITH CONCEP OR SCREEN – THIS PRODUCT ALONE

Apply this product, either preplant surface, preplant incorporated, or preemergence, using the appropriate rate specified below. Apply this product alone only when the Sorghum seed has been properly treated by the seed company with Concep or Screen.

Pre-plant Surface Applied: Refer to instructions for the of this product under APPLICATION PROCEDURES. For minimum-tillage or no-tillage systems only, this product may be applied up to 45 days before planting in CO, IA, IL, KS, MO, NE, and SD. Use only split applications for treatments made 30 to 45 days before planting, with two-thirds of the broadcast rate applied initially and the remaining one-third at planting. Apply 1.5 pts./A of this product on medium soils or 1.67 pts./A on fine soils. Treatments less than 30 days prior to planting may be either as split or single application. Apply 1.33 pts./A of this product on coarse soils not more than 2 weeks prior to planting. Under dry conditions, irrigation after application is recommended to move this product into the soil.

Preplant Incorporated or Preemergence: Refer to instructions for use of this product under *APPLICATION PROCEDURES*. Broadcast 1 to 1.33 pts./A of this product on coarse soils, 1.33 to 1.5 pts./A on medium soils, or 1.33 to 1.67 pts./A on fine soils.

Use Precautions: (1) If Sorghum seed is not properly treated with Concep or Screen, this product will severely injure the crop. (2) Under high soil moisture conditions prior to Sorghum emergence, injury may occur following the use of this product. The crop will normally outgrow this effect. (3) Do not use this product on Sorghum grown under dry mulch tillage, or injury may occur. (4) Except for the split preplant surface treatment, do not make more than one application per year, or illegal residues may result.

SORGHUM (GRAIN OR FORAGE) SEED TREATED WITH CONCEP OR SCREEN - THIS PRODUCT IN COMBINATIONS

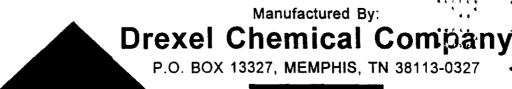
This product tank mixed with Atrazine may be applied in water or fluid fertilizer. Apply this product in tank mixtures only when the Sorghum seed has been properly treated by the seed company with Concep or Screen.

IMPORTANT: FOR TANK MIXTURES WITH ATRAZINE - If applying this product in tank mixture with Atrazine, all the restrictions and rate limitations on the Atrazine label must be followed if more restrictive/protective than those on this label. In addition, if Atrazine is/must be applied at rates lower than those recommended on this label, broadleaf weed control may be affected. Refer to the Atrazine label for weeds controlled at the reduced rates.

Use Precautions: (1) Applications of this product + Atrazine on highly alkaline soils or on eroded areas where calcareous subsoils are exposed may cause Sorghum injury. (2) If Sorghum seed is not properly treated with Concep or Screen, this product + Atrazine may severely injure the crop. (3) Under high soil moisture conditions prior to Sorghum emergence, injury may occur following the use of this product + Atrazine. The crop will normally outgrow this effect. (4) Do not use this product + Atrazine on Sorghum grown under dry mulch tillage, or injury may occur. (5) Except for the split preplant surface treatment, do not make more than one application per year, or illegal residues may result.

TANK MIXTURE WITH ATRAZINE

In addition to the weeds controlled by this product alone, this product + Atrazine also controls the following broadleaf weeds when applied either preplant surface, preplant incorporated, or preemergence: Cocklebur, Common purslane, Hairy nightshade, Lambsquarters, Morningglory, Ragweed, Smartweed, and Velvetleaf.



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Preplant Surface-Applied: Refer to instructions for use of this product under APPLICATION PROCEDURES. For minimum-tillage or no-tillage systems only, this product + Atrazine may be applied up to 45 days prior to planting in IA, IL, Eastern KS, MO, NE, and SD. Use only split applications for treatments made 30 to 45 days prior to planting, with two-thirds of the broadcast rate applied initially and the remaining one-third applied at planting. Apply 1.5 pts./A of this product + 1.7 to 2 lbs./A of Atrazine 90DF* on medium soils with 1.5 % organic matter or greater. Apply 1.5 pts./A of this product + 1.7 to 2 lbs./A of Atrazine 90DF on fine soils with 1.5% organic matter or greater. Treatments less than 30 days prior to planting may be made either as a split or single application. Under dry conditions, irrigation after application is recommended to move this product + Atrazine into the soil.

Use Precautions: To avoid crop injury, (1) Do not use on coarse soils, and (2) Do not use on medium soils with less than 1.5% organic matter.

Preplant Incorporated or Preemergence: Refer to instructions for use of this product under APPLICATION PROCEDURES. On medium soils with 1.5% organic matter or greater, apply 1 pt./A of this product + 1.3 lbs./A of Atrazine 90DF*. On fine soils with less than 1.5% organic matter, apply 1 pt./A of this product + 1.3 lbs./A of Atrazine 90DF. On fine soils with 1.5% organic matter or greater, apply 1.2 to 1.33 pts./A of this product + 1.6 to 1.8 lbs./A of Atrazine 90DF. *When using Atrazine 4L, use equivalent rates. One pound of Atrazine 90DF equals 1.8 pts. Atrazine 4L.

Use Precautions: To avoid crop injury, (1) Do not use on Coarse soils; (2) Do not use on medium soils with less than 1.5% organic matter; (3) Do not use in NM, OK, or TX, except in Northeast OK and the TX Gulf Coast and the Blacklands areas; and (4) Do not apply preplant incorporated in AZ or the Imperial Valley of CA.

TANK MIXTURE OF THIS PRODUCT OR THIS PRODUCT + ATRAZINE WITH GRAMOXONE EXTRA, LANDMASTER BW, OR GLYPHOSATE FOR MINIMUM-TILLAGE OR NO-TILL-AGE SYSTEMS

In minimum-tillage or no-tillage systems where Sorghum (seed treated with Concep or Screen) is planted directly into a cover crop, stale seedbed, established sod, or previous crop residues, the contact herbicides Gramoxone Extra, Landmaster BW, or Glyphosate may be tank mixed with this product or this product + Atrazine. See Comment No.7 following Chart 1. This product or this product plus Atrazine portion of the tank mixture provides preemergence control of the weeds listed on this label under the respective sections.

Refer to the label of each product used in combination and observe the planting details, restrictions, and all other use precautions and limitations.

Application: Apply before, during or after planting, but before Sorghum emerges, at the appropriate rates listed under **Sorghum (Grain or Forage) – This product Alone or – This Product in Combinations – Tank Mixture with Atrazine**, respectively. Add Gramoxone Extra, Landmaster BW, or Glyphosate at the following broadcast rates:

Gramoxone Extra: 1.5 to 2, 2 to 1.67, or 1.67 to 3 pts./A to 1 to 3, 3 to 6, or 6-inch tall weeds, respectively. Apply surfactant at 1 or 2 pts./100 gals. of spray mixture with 75% or greater or 50 to 74% nonionic active ingredient, respectively. This treatment will not control weeds taller than 6 inches.

Landmaster BW: 27 to 54 ozs./A depending on weed species and size. See the Landmaster BW label for weeds controlled, recommended rates for specific weeds, and other information concerning use.

Glyphosate: See the Glyphosate or Roundup RT label for weeds controlled, recommended rates, and other use directions.

Apply in a minimum of 20 gals, of water per acre with conventional spray equipment.

Me-Too-Lachlor[™] is a trademark of Drexel Chamical Company Concep[®] is a trademark of Syngenta Group Company Screen[®] is a trademark of Monsanto Company.