

33560-41

9/2/2003

1/7/03



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

SEP 2 2003

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Vernell Stornes  
Pro-Serve, Inc.  
PO Box 161059  
Memphis, TN 38186-1059

Dear Mr. Stornes:

Subject: First Aid Revisions per PR Notice 2001-1  
Products: Pronone MG and Pronone 10G, Pronone Power Pellet Herbicide  
Registration Number: 33560-21, 33560-41  
Your Submission Dated: 07/01/03

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. **33560-21 (Pronone MG and Pronone 10G)**

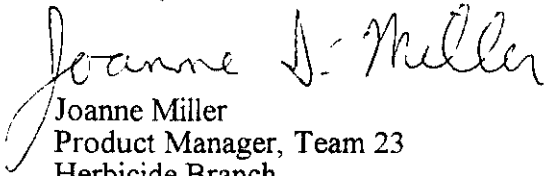
- On both labels, the NOTE TO PHYSICIAN which reads, "Probable mucosal damage may contraindicate the use of gastric lavage," is only necessary for corrosive or Toxicity Category I Eye or Skin Irritants. Please remove this statement from the label.
- On both labels, the order of the First Aid statements and the order of the Hazards to Humans and Domestic Animals statements should correspond, with the most severe routes of exposure listed first. The HAZARDS TO HUMANS AND DOMESTIC ANIMALS section should be changed to, "Causes moderate eye irritation. Do not get in eyes or on skin or clothing. Harmful if adsorbed through skin or swallowed. Wash thoroughly with soap and water after handling."
- On both labels in the STORAGE AND DISPOSAL section, add specific information pertaining to the storage of this pesticide under the Storage subheading.
- On both labels, in the AGRICULTURAL USE REQUIREMENTS section, change "Waterproof gloves" to "Chemical resistant gloves made of any waterproof material."
- On the Pronone 10G label, place a box around the PPE section (as on the Pronone MG label).

2. **33560-41 (Pronone Power Pellet Herbicide)**

- The order of the First Aid statements and the order of the Hazards to Humans and Domestic Animals statements should correspond, with the most severe routes of exposure listed first. The HAZARDS TO HUMANS AND DOMESTIC ANIMALS section should be changed to "Corrosive. Causes irreversible eye damage. Wear protective eyewear (goggles, face shield, or safety glasses. Do not get in eyes or on clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse."
- In the SPECIES CONTROLLED section, the Wild Plum listing is not in the proper column. Please align the wild plum listing so it appears in the third column as it should.
- In the PPE section, "Waterproof gloves" should be changed to "Chemical resistant gloves made of any waterproof material."

Submit three (3) copies of final printed labeling incorporating the above changes before you release these products for shipment. Amended labeling will supercede all previously accepted labels. Stamped copies of labeling are enclosed for your records.

Sincerely,



Joanne Miller  
Product Manager, Team 23  
Herbicide Branch  
Registration Division

Enclosure

# PRONONE® POWER PELLET HERBICIDE

<i>Active Ingredient:</i>	<i>By Wt.</i>
Hexazinone	
3-cyclohexyl-6-(dimethylamino)-1-methyl-1,3,5-triazine-2,4-(1H,3H)-dione.....	75%
<i>Inert Ingredients:</i> .....	25%
TOTAL:.....	100%

5.5 lb. Net Wt.

EPA Est. No. 33560-TN-1      EPA Reg. No. 33560-41

**KEEP OUT OF REACH OF CHILDREN**

## DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail).

### FIRST AID

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lens, if present, after first five minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or a doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container with you when calling a poison control center of doctor or going for treatment.

**NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.**

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**Corrosive:** Causes irreversible eye damage. Harmful if swallowed. *Do not* get in eyes or on clothing. Wear long sleeved shirt and long pants, socks and shoes and goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

### PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear long-sleeved shirt and long pants and shoes plus socks, waterproof gloves and protective eyewear. 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. *Do not* store near food or feed products. Store out of the weather.

### USER SAFETY RECOMMENDATIONS:

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.

### 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 used by wildlife and aquatic life or for domestic and irrigation purposes. *Do not* apply where runoff is likely to occur.

The active ingredient, hexazinone, in this product is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

### GENERAL INFORMATION

Pro-Serve's PRONONE POWER PELLET HERBICIDE is a pellet of Hexazinone to be used for brush control in reforestation areas, range and non-cropland areas.

ACCEPTED  
COMMENTS  
By EPA Letter Dated

SEP 2 2003

Under the Federal Insecticide, Fungicide, and Herbicide Act as amended, for the pesticide registered under EPA Reg. No. 33560-41

## PRO-SERVE, INC.

400 EAST BROOKS ROAD • MEMPHIS, TN 38109

PRONONE POWER PELLET is an effective general herbicide providing residual control of many woody plants. It is absorbed through the roots.

Moisture is required to activate PRONONE POWER PELLETS in the soil. Best results are obtained when the soil is moist at time of application and ¼ to ½ inch of rainfall occurs within 2 weeks after application.

Woody plants usually respond within 3 to 6 weeks after sufficient rainfall has dissolved the pellet and carried the herbicide into the root zone where it is absorbed during periods of active plant growth. Defoliation and subsequent refoilation may occur, but susceptible plants are killed. The response to the treatment will vary with the amount applied, soil type, rainfall, timing and uniformity of application and other conditions.

**DIRECTIONS FOR USE**

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Pro-Serve, Inc. will not be responsible for losses or damages resulting from the use of this product in any manner not specifically recommended by Pro-Serve, Inc. User assumes all risk associated with such non-recommended use.

The correct use rates by crop and geographical area, specified on the label, and proper loading site considerations and application procedures must be followed to minimize potential for hexazinone movement into ground water. Consult with your state pesticide lead agency for information regarding soil permeability, aquifer vulnerability, and best management practices in your area.

*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.

**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 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 48 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, chemical resistant gloves, shoes plus socks and protective eyewear

**USE PRECAUTIONS**

Injury or loss to desirable trees or other plants 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. To prevent injury or loss of desirable trees or bushes, measure the distance from the base (trunk) to the dripline of the desirable plant. Multiply this distance by three and do not apply Power Pellets within this distance. *Do not* use on lawns, walks, driveways, tennis courts or similar areas. Prevent contact with desirable plants. Keep from contact with fertilizers, insecticides, fungicides and seeds.

**PRO-SERVE, INC.**

400 EAST BROOKS ROAD • MEMPHIS, TN 38109

**APPLICATION:** Apply PRONONE POWER PELLET HERBICIDE by hand to the soil around specific plants or in a grid pattern for area control.

Make application just before or during the period of active growth of brush species to be controlled. For effective brush control and prevention of damage of desirable vegetation *do not* apply to brush standing in water, *do not* use where desirable trees or shrubs are immediately adjacent to treated areas.

**RANGELAND, PASTURE**

**TREE AND BRUSH CONTROL**

**Single Stemmed Plants**

For single stem plants, apply 1-2 pellets for every inch of stem diameter. When more than one pellet is needed, distribute the pellets uniformly around the stem out approximately half way between the stem and the canopy edge.

**Multi-Stemmed Plants**

For multi-stemmed plants such as Mesquite, Huisache and Multiflora Rose that are 2ft to 3ft tall, apply 1-2 pellets at the base of the plant. For plants 3ft to 6ft tall apply 2-4 pellets at the base of the plant. For Red Berry Cedar (Juniper), apply 1-2 pellets for every 3ft of plant height or every 3ft of canopy diameter, whichever is greater. Apply the pellets uniformly around the plant approximately halfway between the plants stem and the canopy edge.

**Fence Line Tree and Brush Control**

For the control of trees and brush in Pasture and Rangeland fences, apply 1 pellet in the fence line for every 3ft of fence length. For heavy infestations, double the rate to 1 pellet for every 1.5ft of fence length.

**Smutgrass Control**

Apply 0.5- 1 pellet per individual clump or plant. Apply by hand to the crown (center) of plant. Do not exceed 600 Power Pellets per acre per season.

Power Pellets are not recommended for

smutgrass control in pastures or rangeland where plant density exceeds 25% coverage. Application of Power Pellets in smutgrass infestations exceeding 25% can damage and/ or kill surrounding desirable grasses and forage.

**NOTE:** Do not apply more than 600 pellets per acre per season. Late winter to early summer application is recommended for best results. Do not mow or cut treated brush or trees until 12 months after application. When treating regrowth from cut-off trees and brush, the regrowth must be at least one year old and the rate of application based upon the original plant size. Do not use on marshy or poorly drained sites or on soils classified as clays. For these use sites, there is no restriction on grazing by domestic animals or on cutting forage for hay.

**FORESTRY:**

PRONONE POWER PELLET HERBICIDE is recommended for use in forestry site preparation, preharvest control of hardwoods and pine release in pine-hardwood stands for growth enhancement of loblolly, slash, shortleaf and longleaf pine. The treatment provides control of many woody plants such as black cherry, blackgum\*, dogwood\*, elm, hawthorn, hickory\*, oaks, red maple\*, sweetgum and sumac\*.

*\*Considered hard to kill*

Apply at a rate of 1,700 to 5,800 pellets per acre for preharvest, site preparation, and wildlife openings, and 900 to 3,800 pellets per acre for pine release. Make the application using a grid pattern as suggested in the table below. *Do not* apply POWER PELLETS closer than 36" to seedlings or directly up slope from seedlings. When treating large stems and where more than one pellet is needed per stem, make application around the stem.

The rate per acre and grid pattern will depend on soil texture and woody plant species composition. Use the higher rates on fine-textured soils and when the major component of the hardwoods is a difficult-to-control species such a blackgum, dogwood, hickory and red maple.

**PRO-SERVE, INC.**

400 EAST BROOKS ROAD • MEMPHIS, TN 38109

Use the lower rates on medium to coarse texture soils where elm, cherry, oak and sweetgum are dominant. For individual stem treatment, apply the pellet to the soil within 3' of the root collar at the rate of 1 or 2 pellets for each 1" diameter of brush to be controlled. When treating large stems and when more than one pellet is needed per stem, make application around the stem.

**TABLE OF SUGGESTED APPLICATION PATTERNS for PRONONE POWER PELLETS**

For Site Preparation and Preharvest Control of Hardwoods

Soil		Grid Spacing (ft)
Coarse	1 Pellet	5' X 5' or 4' X 5' or 4' X 4'
Medium & Fine	1 Pellet	3' X 4" or 3' X 3' or 2½' X 3'
For Pine Release		Soil Grid Spacing (ft)
Coarse	1 Pellet	6' X 8"* or 5' X 6'
Medium & Fine	1 Pellet	4' X 6'

\*Use for deep sands with pines four years of age or older.

NOTE: As spacing decreases, rate increases.

PRONONE POWER PELLETS should be applied during the period from late winter (bud-break) to early summer (full leaf). **DO NOT BURN** treated sites after initial foliage browning is evident. Burn only after brush has completely defoliated, at least once, from sufficient root uptake of the herbicide. Inconsistent results may occur if the site is burned up to 3 to 6 months prior to treatment.

Results may be unsatisfactory where stump sprouts of less than one year's growth predominate.

NOTE: Use on 1-year old or 4-year old or older seedlings is acceptable; however, injury may result from use on 2 and 3-year old seedlings where roots growth is extensive but hardness is lacking. **Do not graze** domestic animals on treated areas within 60 days after treatment.

**SPECIES CONTROLLED:**

- Alder
- Huisache
- Red Maple
- Ash
- Juniper
- Small Soapweed (*Yucca*)

- Aspen
- Balsam Poplar
- Birch
- Black Cherry
- Blackgum
- Catclaw, Acacia
- Deerbrush
- Dogwood
- Elm
- Hackberry
- Hawthorn
- Hazel
- Hickory
- Locust
- Lotebush
- Manzanita
- Mesquite
- Mulberry
- Multiflora Rose
- Myrtle
- Oaks (*except live oaks*) → Wild Plum
- Osage orange
- Persimmon
- Privet
- Red Cedar
- Glauca*
- Snowbrush
- Sourwood
- Sumac
- Sweetbay
- Sweetgum
- Tallow
- Wild Cherry
- Whitebrush
- Whitethorn
- Willow
- Yellow Poplar

**GENERAL BRUSH CONTROL**

**Non-cropland**

PRONONE POWER PELLET HERBICIDE is recommended for brush control in noncropland areas such as utility, highway, pipeline and railroad rights-of-way, petroleum tank farms, lumberyards, storage areas, industrial plant sites, the berm of drainage ditches (do not apply to the inside of ditch banks or to the inside of banks along waterways) and other similar areas. Apply at 1-2 pellets per inch of stem diameter or as broadcast or grid pattern with rates up to 7,000 pellets per acre.

For multi-stemmed and low-growing brush that have stem diameters that are difficult to determine, apply at 1-2 pellets per 3' of canopy width. For tall, slender brush types, apply 2-4 pellets per 3' of height. Base rate on whichever canopy dimension is greater. If treating resprouts from brush disturbed by cutting, the rate of application should be based on the original tree size, not the small regrowth.

NOTE: At rates greater than 5,000 pellets per acre, do not cut forage or hay nor graze domestic animals on treated areas for 2 years. At rates between 600 to 5,000 pellets per acre do not cut for forage or hay nor graze domestic animals on treated areas for 60 days. At rates below 600 pellets per acre, there is no restriction on grazing by domestic animals nor on cutting for forage or hay.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PRO-SERVE, INC.**

400 EAST BROOKS ROAD • MEMPHIS, TN 38109

**STORAGE:** Store product in original container only, away from other pesticides, fertilizer, food or feed. Keep product dry.

**CONTAINER DISPOSAL:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedure approved by state and local authorities.

**PESTICIDE DISPOSAL:** Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**NOTICE OF WARRANTY**

Pro-Serve warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes states on such label only when used in accordance with directions under normal use conditions. It is impossible to eliminate all risk inherently associated with use of this product. In-effectiveness 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 Pro-Serve, Inc. In no case shall Pro-Serve, Inc. be liable for consequential, special or indirect damages resulting from the use or handling of this product. All such risks shall be assumed by buyer. Pro-Serve makes no warranties of merchantability or fitness for a particular purpose nor any other express or implied warranty except as stated above.

**NOTICE TO BUYER:** Purchase of this material does not confer any rights under patents of countries outside of the United States

**PRO-SERVE, INC.**

---

400 EAST BROOKS ROAD • MEMPHIS, TN 38109