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33560-45

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United States Environmental Protection Agency  
Washington, D.C. 20460

Office of  
Prevention, Pesticides and  
Toxic Substances

OCT 18 1993

Robert J Cochran  
PRO SERVE INC  
400 EAST BROOKS RD BOX 161059  
MEMPHIS TN 38186

Subject: Label Amendment Submission of 06/22/93  
in Compliance with WPS Labeling Requirements  
EPA Reg No. 33560-45  
PRONONE 25G

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is accepted subject to the comments listed below.

Based on your certification, the Agency has accepted only those changes to your labeling which are necessary to comply with PR Notices 93-7 and 93-11, which reflect the WPS labeling requirements of 40 CFR part 156, subpart K. Any other labeling changes submitted in connection with this amendment application and not directly related to compliance with PR Notice 93-7 or 93-11 have neither been reviewed nor accepted by the Agency. If you wish to make any such changes, you must submit a separate amendment application proposing them. If your product registration is currently suspended, acceptance of this labeling amendment does not affect the suspension in any way.

A copy of your proposed labeling stamped "Accepted with comments" is attached. Make any required changes described in the attached and send three copies of final labeling as soon as it is available to:

Document Processing Desk (FIN-LABEL)

20712

Office of Pesticide Programs (H-7504C)  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460-0001

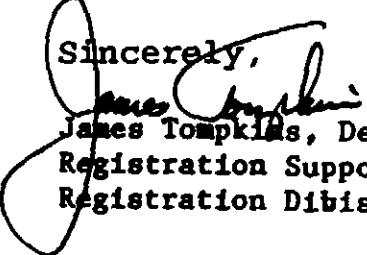
Hand or courier deliveries of final labels may be made to:

Document Processing Desk (FIN-LABEL)  
Room 266A Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Please correct the typographical errors circled on the draft before printing final labeling.

In your final labeling the "Agricultural Use Requirements" text must be contained in a clearly separate box. This box may be set apart by a line, by another graphical device, by a different color background, or in any other way that clearly distinguishes it from surrounding text.

Sincerely,

  
James Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

DRAFT LABEL

PRONONE 25G

GRANULAR HERBICIDE

**BEST AVAILABLE COPY**

ACTIVE INGREDIENT: Hexazinone

3-cyclohexyl-6-(dimethylamino)-1-methyl-1,3,5-triazine-2,4(1H,3H)-dione 25%

INERT INGREDIENTS: 75%

U.S. Pats. 3,902,887 & 3,983,116

KEEP OUT OF REACH OF CHILDREN

CAUTION!

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Avoid contact with skin, eyes or clothing. In case of contact, flush eyes or skin with plenty of water. Get medical attention if irritation persists. ~~Remove contaminated clothing and wash before reuse.~~

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

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.

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ACCEPTED  
 WITH COMMENTS  
 EPA Letter Dated

*Oct 18 1993*

the Federal Insecticide, Fungicide, and Rodenticide Act  
 provided, for the pesticide  
 under EPA Reg. No.  
33.560-45

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**ENVIRONMENTAL HAZARDS**

Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not apply where runoff is likely to occur. Do not contaminate water when disposing of equipment washwater, or by disposal of waste.

EPA Est. No. 33560-TN-1

50 pounds net weight

EPA Reg. No. 33560-45

**IMPORTANT**

Injury to or loss of desirable trees or other plants may result from failure to observe the following. Do not apply or empty equipment 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 contact with desirable plants. Keep from contact with fertilizers, insecticides, fungicides and seeds.

Thoroughly clean all traces of PRONONE 25G Granular Herbicide from application equipment immediately after use. Wash equipment thoroughly with water.

**GENERAL INFORMATION**

PRONONE 25G Granular herbicide is a special granular product to be distributed in a broadcast pattern on the soil surface, in reforestation areas for control of undesirable woody and herbaceous plants. Rainfall dissolves the chemical (hexazinone) from the granules and moves the herbicide into the root zone where it is absorbed during periods of active plant growth.

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Symptoms of herbicidal activity generally appear within 3 to 4 weeks for herbaceous plants and 4 to 8 weeks for woody plants, after sufficient rainfall has carried the herbicide into the root zone. Defoliation and subsequent refoliation may occur, but susceptible plants are killed.

**DIRECTIONS FOR USE**

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

Pro-Serve's PRONONE 25G should be used only in accordance with recommendations on this label.

Pro-Serve will not be responsible for losses or damages resulting from use of this product in any manner not specifically recommended by Pro-Serve. User assumes all risk associated with such non-recommended use.

Refer to product labeling for use restrictions to protect ENDANGERED SPECIES. 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 you 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, 40CFR part 170. This Standard contains requirements for the June 19, 1993

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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 person 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 24 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, water proof gloves, shoes plus socks.

**BEST AVAILABLE COPY**

**HOW TO APPLY**

Apply the granules by appropriate ground or aerial equipment. Calibrate the equipment to distribute the granules uniformly over the area to be treated. ~~Wear gloves when handling granules to prevent contact with skin.~~ Apply before or during the period of active growth, when rainfall can be expected to activate the chemical in the soil. Do not apply to frozen soil, or to water saturated soils when rainfall is expected within 24 hours. Distribution across treatment swath must be uniform.

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FOR CONTROL OF CERTAIN WEED AND BRUSH SPECIES

FOR FORESTRY SITE PREPARATION AND CONIFER RELEASE

East of the Rocky Mountains: PRONONE 25G is recommended for forestry site preparation and conifer release in areas of greater than 20 inches of annual rainfall east of the Rocky Mountains where loblolly, longleaf, red, shortleaf, slash and Virginia pines are grown. PRONONE 25G is also recommended for site preparation where white spruce will be planted. When used as directed PRONONE 25G controls herbaceous weeds such as annual bluegrass, barnyard grass, bentgrass, bromegrass, catsear, common groundsel, common ragweed, false-dandelion, fleabane, foxtail, oxeye daisy, Pennsylvania smartweed, velvetgrass, and wild carrot.

Treatment provides partial control of curly dock, dandelion, willowweed (fireweed), fescue, goldenrod, horseweed, orchardgrass, quackgrass, ryegrass.

PRONONE 25G, when used as directed, also controls many woody plants including American elder, ashes (white, green), aspen (big tooth, trembling), balsam poplar, birch, blackcherry, blackgum, boxelder\*\*, brambles (such as blackberry, dewberry, raspberry), cherry\*, chokeberry, dogwood\* (flowering), eastern red cedar, elm hawthorne, hazel, hickory\*, honeysuckle, hornbeam, mulberry, multiflora rose, Norway maple\*\*, redmaple\*, oaks (such as post, southern red, turkey, water, and white), Russian olive, sourwood, sumac, sweetgum, wild plum and willow.

\*Considered hard-to-kill.

\*\*Controlled using individual stem application.

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APPLY AT THE FOLLOWING RATES FOR SOIL TEXTURE:

POUNDS PRODUCT PER ACRE

<u>SOIL TEXTURE:</u>	<u>SITE PREPARATION 1)</u>	<u>CONIFER RELEASE 2)</u>
Sand, Loamy Sand, Sandy Loam	6-12	3-6
Loam, Sandy Clay Loam Silt Loam	12-16	6-9
Clay Loam, Sandy Clay, Silty Clay Loam, Silt, Silt Clay, Clay	14-18	9-12

NOTE: Use the lower rates on coarse-textured soils and soils low in organic matter; use higher rates on fine-textured soils and soils high in organic matter.

PRONONE 25G is not recommended on poorly drained soils or marshy sites. PRONONE results may be slow to appear and maximum results will be seen 12-24 months following application.

Treatment may injure or kill young conifers that are under stress. Established conifer saplings (5 years or more) are usually not injured at recommended rates, while herbaceous weeds and competing susceptible hardwood brush are controlled or suppressed.

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- 1) In Site Preparation Areas, where burning is desired, burn only after residual stand has completely defoliated at least twice, allowing for sufficient root uptake of PRONONE 25G, usually 60-90 days after rainfall.
- 2) In Conifer Release Areas, Some mortality of conifer may be expected when application is erratic or sapling vigor is lacking due to damage by insects, disease, drought, winter stress, or other stress. Excessive injury may result when applications are made to loblolly pine that are less than four years of age since transplanting on coarse textured soils, or three years of age since transplanting on fine textured soils. Application to gravelly, rocky, or exposed subsoil may result in conifer injury. When soil texture varies abruptly, inconsistent results may occur.

TIMING: For best results, apply in spring when weeds and brush are actively growing, after the danger of a killing frost has passed (for target species) and when sufficient rainfall is expected. Do not graze domestic animals on treated areas within 30 days after treatment.

West of Rocky Mountains: PRONONE 25G is also recommended for control of certain weeds and brush species in forestry site preparation and conifer release operations where Douglas fir, Grand fir, Noble Fir, White Fir, Ponderosa Pine, Jeffrey Pine and Sitka Spruce are grown.

Since the effect of PRONONE 25G on conifers varies with soils, uniformity of application and environmental conditions, it is suggested that foresters limit their first use to small areas.

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**TIMING**

**West of Cascades (and other areas of high spring rainfall):** For best results, apply in the spring when weeds are growing.

**East of Cascades (and other areas of low spring rainfall):** For best results, apply in the fall before soil freezes or in the spring in anticipation of rainfall. Weed control results from spring applications will be dependent on sufficient rainfall following treatment to activate PRONONE 25G. Spring applications should be made after snow cover melts.

Do not graze domestic animals on treated areas within 30 days after treatment.

**HERBACEOUS WEED CONTROL**

When used as directed, PRONONE 25G controls weeds such as annual bluegrass, barnyardgrass, false dandelion, catsear, fleabane, common groundsel, foxtail, oxeye daisy, velvetgrass and wild carrot. Treatment provides partial control of dandelion, fescue, goldenrod, heath aster, orchardgrass, ryegrass, smart-weed, willowweed (fireweed).

**Application Rates:** Apply as a pre-plant broadcast application at rates of 4-8 lbs. per acre. Use the lower rates on coarse-textured soils and soils low in organic matter. Use the higher rates on fine textured soils and soils high in organic matter. Refer to "Use Limitations" section for specific details.

Moisture is necessary to activate PRONONE 25G. Best results are obtained when weeds are less than 2 inches in height or diameter, soil is moist at time of application and half to 1 inch of rainfall occurs within 2 weeks after application.

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**BRUSH CONTROL**

Among the brush species controlled are: Deerbrush ceonothus, squawcarpet, snowbrush ceonothus (varnishleaf ceonothus) and greenleaf manzanita.

**Application Rates:** Use PRONONE 25G for brush control in forestry site preparation and conifer release where either Ponderosa Pine or Jeffrey Pine is the primary coniferous species. Apply PRONONE 25G at rates of 6-12 lbs. per acre. Use the lower rates on coarse-textured soils and soils low in organic matter; use the higher rates on fine-textured soils and soils high in organic matter.

For best results, application should be made to brush seedlings or sprouts when less than 18 inches in height or diameter. Applications may be made in the fall before the soil freezes or in the spring. Fall applications generally provide better results.

PRONONE 25G effects may be slow to appear and maximum results will be seen 12-24 months following the application.

**Use Limitations:**

1. Do not use on gravelly or rocky soils, exposed subsoils, clay knobs, sand or sandy soils with 85% or more sand.
2. Do not use on any soil containing less than 1% organic matter.
3. On soils high in organic matter (greater than 5%) effectiveness of PRONONE 25G is reduced and results may be unsatisfactory.
4. Do not use on loamy sand or sandy loam with less than 2% organic matter (except for Ponderosa and Jeffrey Pine).

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- 5. On first year plantations, apply PRONONE 25G (either pre-plant or post-plant) to transplant stock that is 2 years old (2-0) or more, (1 year old (1-0) for Ponderosa Pine and Jeffrey Pine).
- 6. When applying PRONONE 25G after transplanting, wait until rainfall has settled the soil around the base of the transplants before making the treatment.

**STORAGE AND DISPOSAL**

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

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

**CONTAINER DISPOSAL:** Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then, dispose of bags in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**NOTICE OF WARRANTY**

Pro-Serve warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for purposes stated on such label only when used in accordance with direction under normal use conditions. It is impossible to eliminate all risk inherently associated with use of this product.

Ineffectiveness 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 be liable for consequential, special or indirect damages resulting from the use or

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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.

MANUFACTURED BY: PRO-SERVE, INC., 400 EAST BROOKS ROAD, MEMPHIS, TN 38109.

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