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

SEP 2 5 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 25G

Registration Number: 33560-45 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. 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.
- 2. 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. In the HAZARDS to HUMANS and DOMESTIC ANIMALS section, the order of the first and second sentences should be switched so that "Causes moderate eye irritation" is followed by "Harmful is adsorbed through skin or swallowed."
- 3. In the STORAGE AND DISPOSAL section add "Pesticide" in front of the Storage subheading. In the new "Pesticide Storage" section add specific information pertaining to the storage of this pesticide product.
- 4. In the AGRICULTURAL USE REQUIREMENTS section, change "Waterproof gloves" 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® 25G

Granular Herbicide

Active Ingredient

By Weight

Hexazinone

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

TOTAL

100%

50 pounds net weight

EPA Reg. No. 33560-45 EPA Est. No. 33560-TN-1

CAUTION

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

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

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

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

Long-sleeved shirt and long pants.

Shoes plus socks.

Protective eyewear

Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

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 when disposing of equipment washwaters.

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 ground-water contamination.

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 25 2003

Under the Federal Insecticide, Fundicide, and Rodemicide Act as amended, for the pesticide registered under EPA Reg. No. 33560-45

GENERAL INFORMATION

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

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.

Thoroughly clean all traces of PRONONE 25G Granular Herbicide from application equipment immediately after use. Keep from contact with fertilizers, insecticides, fungicides and seeds.

APPLICATION INFORMATION

Apply the granules by appropriate ground or aerial equipment. Calibrate the equipment to distribute the granules uniformly over the area to be treated. 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.

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, 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 for use site and geographical area, specified on the label and application directions 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 for your area.

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 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.

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:

Coverails Waterproof gloves

Shoes plus socks

Protective eyewear

FORESTRY

EAST OF THE ROCKY MOUNTAINS

SITE PREPARATION AND CONIFER RELEASE

PRONONE 25G is recommended for site preparation and conifer release in areas of greater than 20 inches of annual rainfall east of the Rocky Mountains where the following species of pine are grown:

Loblolly Pine Longleaf Pine Shortleaf Pine Slash Pine Virginia Pine White Spruce (site Red Pine prep. only)

APPLICATION TIMING

For best results, apply in spring when weeds and woody plants (brush) are actively growing, after the danger of a killing frost has passed (for target species) and when sufficient rainfall is expected.

USE RATES

Dosages to be used for site preparation and conifer release east of the Rocky Mountains are given in Table 1 below. Where a range of dosage is given, use the high dosage for control of plants that are listed as being only partially controlled, or when long term weed control and woody plant (brush) control is desired.

Table 1. Pounds of PRONONE 25G per acre for control of listed herbaceous weeds and woody plants (brush) for listed use sites.

	Soil Texture	Site Preparation	Conifer Release
•	COARSE: Sand, Loamy Sand, Sandy Loam,	6 to 12	3 to 6
	MEDIUM; Loam, Sandy Clay Loam, Siltloam	12 to 16	6 to 9
	FINE: Clay Loam, Sandy Clay, Silty Clay Loam, Silt, Silt Clay, Clay	14 to 18	9 to 12

PLANTS CONTROLLED

HERBACEOUS PLANTS	
Annual Bluegrass	Fleabane
Asters	Foxtail
Barnyardgrass	Goldenrod*
Bentgrass	Heath Aster*
Bromegrass	Horseweed*
Canada Thistle*	Orchardgrass*
Catsear (false dandelion)	Oxeye Daisy
Common Groundsel	Pennsylvania Smartweed*
Crabgrass*	Quackgrass*
Curly Dock*	Ryegrass*
Dandelion*	Squawcarpet
Elksedge	Velvetgrass
Fescue*	Wild Carrot

*Partial control; use higher rates of the range for soil textures indicated above.

WOODY PLANTS (BRUSH)

Fireweed (willowweed)*

American Elder	Hombeam
Ashes (white, green)	Mulberry
Aspen (big tooth, trembling)	Multiflora Rose
Balsam Poplar	Norway Maple**
Birch	Post Oak
Black Cherry	Raspberry
Blackgum	Red Maple*
Boxeider*	Red Oak

Blackberry	Russian olive
Cherry*	Sourwood
Choke berry	Southern Oak
Dewberry	Sumac
Eastern Red Cedar	Sweetgum
Elm	Turkey Oak
Flowering Dogberry*	Water Oak
Hawthorne	White Oak
Hazel	Wild Plum
Hickory*	Willow
Honeysuckle	Whitehorn

^{*}Partial control: use higher rates of the range for soil textures indicated above.

USE PRECAUTIONS

- Do not use on poorly drained soils. PRONONE 25G results may be slow to appear and maximum results will be seen 12 – 24 months following application.
- 2. Do not graze domestic animals on treated area within 30 after treatment.
- Do not apply to seedbeds or ornamental conifer plantings.
- 4. Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Do not apply or empty equipment near desirable trees or other plants, on areas where their roots may extend or in locations where the chemical may be washed or moved into contact with roots.

Site Preparation Areas

 Do not burn until residual stand has completely defoliated at least twice, allowing for sufficient root uptake to PRONONE 25G, usually 60 – 90 days after rainfall.

Conifer Release Areas

- Do not apply to Loblolly Pine that are less than four years of age since transplanting on coarsetextured soils or three-years of age since transplanting fine-textured soils.
- 2. Do not apply in gravelly, rocky or exposed subsoil since conifer injury may occur.
- Do not apply to Pines under stress due to damage by insects, disease, drought, winter stress or other stress conditions.

WEST OF THE ROCKY MOUNTAINS

^{**}Controlled using individual stem application.

SITE PREPARATION AND CONIFER RELEASE

PRONONE 25G is recommended for site preparation and conifer release where the following species are grown:

Douglas Fir	Ponderosa Pine
Grand Fir	Jeffrey Pine
Noble Fir	Sitka Spruce
White Fir	·

APPLICATION TIMING

West of Cascades (and other areas of high spring rainfall) For best results, apply in spring when weeds and brush are actively 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 (brush) control from spring applications will be dependent upon sufficient rainfall following treatment to activate PRONONE 25G. Spring applications should be made after snow cover melts.

USE RATES

Dosages to be used for use sites preparation and conifer release west of the Rocky Mountains are given in Table 2 below. Where a range of dosage is given use, the high dosage for control of plants that are listed as being only partially controlled, or when long term weed and woody plant (brush) control is desired.

Table 2 Pounds of PRONONE 25G per acre for control of listed herbaceous weeds and woody plants (brush) for listed use sites.

Soil Texture	Herbaceous Weed Control		Woody Plant (brush)**		
	Pre plant	Of	Post plant	Site & Rele	Preparation Conifer
Coarse					
Sand, Loamy Sand,					
Sandy Loam, Loam,		4 to 6			6 to 8
Sandy Clay Siltloam					
Fine					
Clay Loam, Sandy					
Clay, Silt Clay Loam		6 to 8			8 to 12
Sitt, Sitt Clay, Clay		_ 30 0			-

 Where either Ponderosa Pine or Jeffrey Pine is the primary coniferous species

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 and Jeffrey Pine.

When applying PRONONE 25G after transplanting, wait until rainfall has settled the soil around the base of the transplants before making the treatment.

For herbaceous weed control, moisture is necessary to activate PRONONE 25. 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 one inch of rainfall occurs within 2 weeks after application.

For best results for woody plant (brush) control, 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 results may be slow to appear and maximum results will be seen 12 – 24 months following the application.

Because 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.

PLANTS CONTROLLED

HERBACEOUS PLANTS

Annual Bluegrass	Fleabane
Asters	Foxtail
Barnyardgrass	Goldenrod*
Bentgrass	Heath Aster*
Bromegrass	Horseweed*
Canada Thistle*	Orchardgrass*
Catsear (false dandelio	n)* Oxeye Daisy
Common Groundsel	Pennsylvania Smartweed*
Crabgrass*	Quackgrass*
Curly Dock*	Ryegrass*
Dandelion*	Fireweed (Willowweed)*
Elksedge	Velvetgrass
Fescue*	Wild Carrot
*Darial control: use bishor	

*Partial control; use higher rates for soil textures indicated above.

Woody Plant (Brush)

Squawcarpet	Snowbrush (Varnishleaf
Deerbrush Ceonothus	(Ceonothus)
Greenleaf Manzanita	,

- Do not use on gravelly or rocky soils, exposed subsoils, clay knobs, sand or sandy soil with 85% or more sand.
- 2. Do not use on any soil containing less than 1% organic matter.
- Do not use on loamy sand with less than 2% organic matter (except on Ponderosa and Jeffrey Pine). On soils high in organic matter (greater than 5%), effectiveness of PRONONE 25G is reduced and results may be unsatisfactory.
- 4. Do not graze domestic animals on treated area within 30 days after treatment
- 5. Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Do not apply or empty equipment near desirable trees or other plants, on areas where their roots may extend or in locations where the chemical may be washed or moved in to contact with roots.

STORAGE AND DISPOSAL

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

PRODUCT DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an EPA 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 TO BUYER: Purchase of this material does not confer any rights under patents of countries outside of the United States.

NOTICE OF WARRANTY

Pro-Serve, Inc. 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 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, 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 the buyer. Pro-Serve, Inc. MAKES NO WARRANTIES OF MERCHANTABILTY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMLIED WARRANTY EXCEPT AS STATED ABOVE.

PRO-SERVE, INC.