

33560-45

01-14-2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 14 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Vernell Stornes
Pro-Serve, Inc.
P.O. Box 161059
Memphis, TN 38186-1059

Dear Mr. Stornes:

Subject: Pronone® 25G
EPA Registration No. 33560-45
Application and Letter Dated December 15, 2003,
Resubmission in Response to Agency's Letter Dated
September 25, 2003

The subject labeling reflecting comments in this Agency's letter dated September 25, 2003 has been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended provided that you:

- o Submit one copy of the final printed labeling prior to shipping under the amended labeling.

If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment of this product under the amended labeling constitutes acceptance of this condition. A stamped copy of the accepted labeling is enclosed for your records.

Sincerely yours,

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Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (750)

Enclosure

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PRONONE® 25G

Granular Herbicide

Active Ingredient	By Weight
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Hexazinone 3-cyclohexyl-6- (dimethylamino) -1- methyl -1,3,5-triazine-2, 4(1H,3H)-dione.....	25%
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Inert Ingredients	75%
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TOTAL	100%
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50 pounds net weight

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

KEEP OUT OF REACH OF CHILDREN

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 or doctor or going for treatment.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes moderate eye irritation. Harmful if absorbed through skin or swallowed. 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
JAN 14 2004

Federal Insecticide,
Fungicide, and Rodenticide Act
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 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.

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 refoitation 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:

- Coveralls
- Chemical resistant gloves made of any waterproof material
- 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 (<i>site prep. only</i>) |
| Red Pine | |

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
Fireweed (willowweed)*		

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

WOODY PLANTS (BRUSH)

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

***Controlled using individual stem application.*

USE PRECAUTIONS

1. 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.
3. Do not apply to seedbeds or ornamental conifer plantings.
4. Do not use on lawns, walks, driveways, tennis courts, or similar areas.
5. 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

1. 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

1. Do not apply to Loblolly Pine that are less than four years of age since transplanting on coarse-textured 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.
3. 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

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	or Post plant	Site Preparation & Conifer Release
Coarse Sand, Loamy Sand, Sandy Loam, Loam, Sandy Clay Siltloam		4 to 6	6 to 8
Fine Clay Loam, Sandy Clay, Silt Clay Loam Silt, Silt Clay, Clay		6 to 8	8 to 12

** 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 dandelion)* | Oxeye Daisy |
| Common Groundsel | Pennsylvania Smartweed* |
| Crabgrass* | Quackgrass* |
| Curly Dock* | Ryegrass* |
| Dandelion* | Fireweed (Willowweed)* |
| Elksedge | Velvetgrass |
| Fescue* | Wild Carrot |

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

Woody Plant (Brush)

- | | |
|---------------------|-------------------------------------|
| Squawcarpet | Snowbrush (Varnishleaf (Ceonothus)) |
| Deerbrush Ceonothus | |
| Greenleaf Manzanita | |

USE PRECAUTIONS

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1. 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.
3. 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.
6. 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.

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

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 MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

STORAGE AND DISPOSAL

PRO-SERVE, INC.

400 East Brooks Road • Memphis, TN 38109-901-332-7052