

62719-107

08/18/2004

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98



United States Environmental Protection Agency Washington, DC 20460

Registration Amendment Other (X)

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number: Dow AgroSciences/62719-107
2. EPA Product Manager: James A. Tompkins
3. Proposed Classification: None (X) Restricted
4. Company/Product (Name): Dow AgroSciences/Spike 80DF
5. Name and Address of Applicant: Dow AgroSciences LLC, 9330 Zionsville Road, Indianapolis, IN 46268
6. Expedited Review: In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in Composition and labeling to: EPA Reg. No. Product Name

Section - II

Amendment - Explain below. Resubmission in response to Agency letter dated. Notification - Explain below. Final printed labels in response to Agency letter dated. "Me Too" Application. Other- Explain below. NOTIFICATION AUG 18 2004

Notification of Section 3 supplemental labeling entitled "Banded Application for Woody Plant Control in Rangeland, Permanent Pastures, Fencerows, and Clearings for Wildlife Habitat" based on EPA-accepted labeling for Spike® 80W dated July 30, 2004. Note: In order to facilitate the immediate implementation of this new use for Spike 80DF in key market areas of Texas, Oklahoma and New Mexico, this supplemental labeling will be distributed in these states until product bearing the updated label is fully available in channels of trade.

Section - III

1. Material This Product Will Be Packaged In: Child-Resistant Packaging, Unit Packaging, Water Soluble Packaging, 2. Type of Container: Metal, Plastic, Glass, Paper, Other (Specify)
3. Location of Net Contents Information: Label (X) Container
4. Size(s) Retail Container: Lithograph, Paper glued, Stenciled
5. Location of Label Directions: On Label (X) On Labeling accompanying product
6. Manner in Which Label is Affixed to Product: Lithograph, Paper glued, Stenciled

Section - IV

1. Contact Point /Complete items directly below for identification of individual to be contacted, if necessary, to process this application) Name: John J. Jachetta, Ph.D. Title: Regulatory Manager Telephone No. (317) 337-4686
Certification: I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.
2. Signature: [Handwritten Signature] 3. Title: Regulatory Manager
4. Typed Name: John J. Jachetta, Ph.D. 5. Date: August 5, 2004
8. Date Application Received (Stamped)

AUG 16 2004

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Spike[®] 80DF

EPA Reg. No. 62719-107

Banded Application for Woody Plant Control in Rangeland, Permanent Pastures, Fencerows, and Clearings for Wildlife Habitat

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Spike 80DF before applying. Carefully follow all precautionary statements and applicable use directions.
- Except as described below, use of Spike 80DF according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the product container.

Directions for Use

Spike[®] 80DF herbicide is recommended as a ground-applied band application for control of woody plants in rangeland and permanent pastures, for establishment of clearings for enhancement of wildlife habitat, and for control of trees and brush in fencerows.

Note: Before applying, read and understand Mixing Directions, Application Methods and Factors in Herbicidal Response of Woody Plants sections of this supplemental labeling.

Grazing Management

In rangelands and permanent grass pastures, measures to minimize injury to, and maximize growth response of, desirable grasses and other forage species are recommended. These include:

- application during seasons when forage species are not actively growing,
- application in narrow bands using straight stream nozzles to minimize potential injury to desirable herbaceous cover, and,
- utilizing the maximum width between bands that will still allow for optimal woody plant control (refer also to the General Information section above)

For optimum perennial forage grass response, desirable species should be present in the area to be treated at a minimum of 10% of normal plant density (density = plants per unit area) compared to similar rangeland or pasture sites not dominated by woody plants. To encourage forage grass response, grazing should be deferred during the entire active growing season following application. Poor vegetative vigor or inadequate rainfall may necessitate additional grazing deferment during periods of active forage growth. Light to moderate grazing after forage grasses are mature and seed has set will not harm grasses and can aid in seed dispersal. Forage grass production usually increases as woody plant competition for water and nutrients is reduced. However, increased forage production is also dependent on adequate rainfall and a sound grazing management program.

Woody Plants in Rangeland, Permanent Pastures and Fencerows Controlled by Banded Applications

Apply Spike 80DF at 0.95 to 1.25 lb per acre on the following woody plant species:

Note: On rangeland and pastureland, apply 0.95 to 1.25 lb/acre of Spike 80DF where a higher degree of control is required (see Factors in Herbicidal Response of Woody Plants in General Information section of this label). Spike 80DF may be applied at rates as low as 0.63 lb per acre on sites with shallow, rocky and coarse textured soils having low organic matter content, or where partial control is desired.

| Common Name | Scientific Name |
|---|--------------------------------|
| ceniza | <i>Leucophyllum frutescens</i> |
| creosotebush | <i>Larrea tridentata</i> |
| mimosa, catclaw (wait-a-minute-bush) | <i>Mimosa pigra</i> |
| Paloverde | <i>Cercidium</i> spp. |
| sagebrush, big | <i>Artemisia tridentata</i> |
| sagebrush, sand | <i>Artemisia filifolia</i> |
| snakeweed, broom (density less than 1/sq ft) | <i>Gutierrezia sarothrae</i> |
| tarbush | <i>Flourensia cernua</i> |
| whitethorn | <i>Acacia constricta</i> |

Apply Spike 80DF at 0.63 to 2.5 lb per acre on the following woody plant species:

| Common Name | Scientific Name |
|---------------------|-------------------------|
| oak, sand shinnery† | <i>Quercus havardii</i> |

†**Note:** A wide rate range is provided to accommodate the broad range of soil and climatic variation which occurs in areas occupied by sand shinnery. Use the lowest application rate only on shallow sands in southern part of species range or where partial control is desired. Use a higher dose in indicated rate range for deeper sands and dunes, and on shinnery varieties with tall and dense growth habit which become more prevalent in the mid-to-northern part of the species range (see Factors in Herbicidal Response of Woody Plants in General Information section of this label).

Apply Spike 80DF at 1.25 to 2.5 lb per acre on the following woody plant species:

| Common Name | Scientific Name |
|--|---------------------------|
| oak, bigelow † (partial control) | <i>Quercus durandi</i> |
| oak, mohr † (Partial control) | <i>Quercus mohriana</i> |
| oak, running live † (Partial control) | <i>Quercus virginiana</i> |
| whitebrush | <i>Aloysia lycoides</i> |
| wolfberry, Berlandier | <i>Lycium berlanderi</i> |

† **Note:** Use a higher dosage in indicated rate range on tall and dense stands.

Apply Spike 80DF at 2.5 to 5 lb per acre on the following woody plant species:

| Common Name | Scientific Name |
|-----------------------------|-----------------------------------|
| acacia, blackbrush | <i>Acacia rigidula</i> |
| acacia, catclaw | <i>Acacia greggii</i> |
| acacia, twisted | <i>Acacia tortuosa</i> |
| apple-of-sodom | <i>Solanum sodomeum</i> |
| birch, gray | <i>Betula populifolia</i> |
| blueberry | <i>Vaccinium</i> spp. |
| bluewood (Brazil) | <i>Condalia obovata</i> |
| buckbrush | <i>Symphoricarpos orbiculatus</i> |
| cherry, bitter | <i>Prunus emarginata</i> |
| dogwood, roughleaf | <i>Cornus drummondii</i> |
| elm, American | <i>Ulmus americana</i> |
| elm, winged | <i>Ulmus alata</i> |
| guajillo | <i>Acacia berlanderi</i> |
| guava | <i>Psidium guajava</i> |
| hackberry, spiny (granjeno) | <i>Celtis palida</i> |

| Common Name | Scientific Name |
|--------------------|-------------------------------|
| hackberry, western | <i>Celtis occidentalis</i> |
| hawthorn | <i>Crataegus</i> spp. |
| huckleberry | <i>Gaylussacia</i> spp. |
| koa haole | <i>Leucaena leucophylla</i> |
| locust, black | <i>Robinia pseudoacacia</i> |
| manzanita | <i>Arctostaphylos</i> spp. |
| mulberry, red | <i>Morus rubra</i> |
| oak, black | <i>Quercus velutina</i> |
| oak, blackjack | <i>Quercus marilandica</i> |
| oak, blue | <i>Quercus douglasii</i> |
| oak, bur | <i>Quercus macrocarpa</i> |
| oak, post | <i>Quercus stellata</i> |
| oak, shrub live | <i>Quercus turbinella</i> |
| oak, southern red | <i>Quercus falcata</i> |
| oak, white | <i>Quercus alba</i> |
| rose, multiflora | <i>Rosa multiflora</i> |
| sage, black | <i>Salvia melifera</i> |
| sumac, dwarf | <i>Rhus copallina</i> |
| sumac, littleleaf | <i>Rhus microphylla</i> |
| sumac, skunkbush | <i>Rhus trilobata</i> |
| sumac, smooth | <i>Rhus glabra</i> |
| sumac, staghorn | <i>Rhus typhina</i> |
| thornapple, desert | <i>Datura discolor</i> |
| yaupon | <i>Ilex vomitoria</i> |
| yaupon, desert | <i>Schaefferia cuneifolia</i> |

Apply Spike 80DF at 5 lb per acre on the following woody plant species:

| Common Name | Scientific Name |
|---------------------|------------------------------------|
| alder, red | <i>Alnus rubra</i> |
| alder, speckled | <i>Alnus rugosa</i> |
| aspen, bigtooth | <i>Populus grandidentata</i> |
| beech, American | <i>Fagus grandifolia</i> |
| blackberry | <i>Rubus</i> spp. |
| boxelder | <i>Acer negundo</i> |
| chamise | <i>Adenostoma fasciculatum</i> |
| cherry, black | <i>Prunus serotina</i> |
| chokecherry, common | <i>Prunus virginiana</i> |
| colubrina, Texas | <i>Colubrina texensis</i> |
| cottonwood, eastern | <i>Populus deltoides</i> |
| creeper, Virginia | <i>Parthenocissus quinquefolia</i> |
| dogwood, flowering | <i>Cornus florida</i> |
| douglasfir | <i>Pseudotsuga menziesii</i> |
| fir, balsam | <i>Abies balsamea</i> |
| guayacan | <i>Portiera angustifolia</i> |
| hardhack | <i>Spiraea tomentosa</i> |
| hickory, bitternut | <i>Caraya cordiformis</i> |
| hickory, black | <i>Caraya texana</i> |
| hickory, pignut | <i>Caraya glabra</i> |
| hickory, shagbark | <i>Caraya ovata</i> |
| huisache | <i>Acacia farnesiana</i> |
| kidneywood, Texas | <i>Eysenhardtia texana</i> |
| kudzu | <i>Pueraria lobata</i> |

| Common Name | Scientific Name |
|---------------------------------|--------------------------------|
| leatherstem | <i>Jatropha dioica</i> |
| lotebush (condalia) | <i>Ziziphus obtusifolia</i> |
| maple, bigleaf | <i>Acer macrophyllum</i> |
| maple, sugar | <i>Acer saccharum</i> |
| melaleuca | <i>Melaleuca quinquenervia</i> |
| mountain mahogany, birchleaf | <i>Cercocarpus betuloides</i> |
| oak, California scrub | <i>Quercus dumosa</i> |
| oak, live | <i>Quercus virginiana</i> |
| oak, pin | <i>Quercus palustris</i> |
| oak, red | <i>Quercus rubra</i> |
| oak, white | <i>Quercus alba</i> |
| pine, Australian | <i>Casuarina</i> spp. |
| pine | <i>Pinus</i> spp. |
| poplar, balsam | <i>Populus balsamifera</i> |
| raspberry, black | <i>Rubus occidentalis</i> |
| rose, Macartney | <i>Rosa bracteata</i> |
| spruce, white | <i>Picea glauca</i> |
| sweetgum | <i>Liquidambar styraciflua</i> |
| tamarack | <i>Larix laricina</i> |
| trumpet creeper | <i>Campsis radicans</i> |
| willow | <i>Salix</i> spp. |

Mixing Directions

Thorough mixing and continuous agitation are important to ensure uniform application. Fill the spray tank half-full of water. Start agitation and continue agitation during entire mixing and spraying operation. Add the required amount of Spike 80DF and allow it to mix thoroughly while completing the spray tank filling. If additional product is a liquid, add slowly while filling remainder of tank with water.

Material must be kept in suspension at all times by continuous agitation. If bypass (hydraulic) agitation is used, the return flow should terminate at the bottom of the mixing tank to minimize foaming. Check the sprayer frequently before and during use to insure proper calibration and uniform application.

A master shut-off switch for the entire spraying system and nozzle check valves are recommended on commercial spray equipment.

If hand held or back pack type sprayers are used, determine the amount of water and chemical necessary to cover uniformly the area to be treated. Shake vigorously after filling and periodically during application to maintain product in suspension.

Application Methods

Banded Application (Ground Application Only)

Banded applications of Spike 80DF allow for woody plant control and preservation of grasses and other desirable herbaceous vegetation in rangeland and permanent pastures and in non-cropland areas (such as utility, railroad, and pipeline rights-of-way and fencerows). In banded applications, the rate per acre is equivalent to the broadcast rate, but the herbicide is concentrated into individual herbicide bands spaced 4 to 10 feet apart. Banded applications may be made using a spray volume of 5 or more gallons per acre. Actual herbicide bands should be kept as narrow as possible during application to minimize potential injury or loss of herbaceous vegetation. In areas such as brush-infested fencerows, a single band may be applied. Control is dependent upon root systems intercepting the herbicide in soil beneath treated bands.

Band spacing should be selected based on the size of the woody plants in the area to be treated and the amount of injury or loss of herbaceous vegetation that can be tolerated. Where control of young or seedling woody plants is desired, bands should be spaced closer together. This will achieve maximum exposure to their limited root systems. Where larger more mature woody plants are to be controlled, bands should be spaced at the wider end of the recommended spacing range.

In addition to allowing adequate exposure of the more extensive root systems of these larger woody species for control, use of the wider spacings will further reduce injury or loss of herbaceous vegetation within the treated band.

Within the treated band nearly all vegetation, woody and herbaceous, will be killed. Some herbaceous vegetation close to the treated band with roots extending into it may be severely injured or killed. However, since root systems of herbaceous plants are less extensive most plants outside the treated band are unaffected.

When banded applications are made in an area where straight stream nozzles are positioned more than 5 feet above the soil surface or where woody plant foliage is dense, breakup of individual nozzle streams may occur. If conditions do not permit delivery of intact nozzle streams to the soil surface, efficacy may be reduced and injury of herbaceous vegetation will increase. For this reason, application in the dormant season when there is minimum foliage present is recommended. To avoid breakup of individual nozzle streams by interfering vegetation, applicators may also employ mechanical means to position spray nozzles close to the soil surface such as protected drop nozzles or nozzles mounted at the end of weighted bars which maintain constant contact the soil surface.

Fencerow Applications: For fencerow applications, a single spray band will cover a fencerow 4 to 10 feet wide. Use a rate appropriate to control the most difficult species to control in the fencerow. Use a straight stream nozzle and direct the nozzle stream at the soil surface in the center of the fencerow. For fencerows wider than 10 feet, separate bands may be applied on either side of the fencerow.

Rate example: Assuming the desired rate of Spike 80DF is 5 pounds per acre and the fencerow is 10 feet wide, a one 5-pound bag of Spike 80DF will treat 4356[†] linear feet of fencerow. Determine the delivery rate for the nozzle at the desired spray pressure and the walking speed of the applicator. If the length of the area to be treated is 4356 ft long and the walking speed is 3 mph (264 ft/minute) it would take 16.5 minutes to walk the length of the treatment area. If the delivery rate of the nozzle is 0.6 gallons per minute, the treatment would require approximately 10 gallons (0.6 gallon per minute X 16.5 minute = 10 gallons) of spray solution.

[†] 1 acre = 43560 sq ft (43560 sq ft ÷ 10 ft = 4356 ft)

Individual Plant Treatment

ATTENTION: Do not use this treatment method in any area where there are desirable species in close proximity plants to be eliminated. A small amount of Spike 80DF in contact with the roots of desirable trees or other woody species may cause severe injury or death. See Use Precautions and Restrictions section for precautions for avoiding damage to non-target plants on main product label.

Spike 80DF may be applied in high or low volumes of water for selective control of individual woody plants. Recommended rates will vary depending upon site conditions, with the higher rates needed for difficult to control species, large plants, heavier soils, fall applications and cut brush. Refer to Factors in Herbicidal Response of Woody Plants section for further information.

For high volume applications, mix 1 one pound of Spike 80DF in enough water to make 10 gallons of solution. Apply 10 ounces of material to the soil per every 2 to 4 inches of stem diameter.

For low volume applications, mix 1 pound of Spike 80DF in enough water to make 1 gallon of solution. Apply 1 ounce of material to the soil per every 2 to 4 inches of stem diameter.

7/13

When treating large stems, apply the multiple treatments (spots or bands) in even spacing around the stem.

Two types of equipment are suggested for applying Spike 80DF using banded or individual plant treatment methods, the Solo Model 425 back pack sprayer (or equivalent) for both banding and individual plant treatment and the Spot Gun for individual plant treatment.

The Solo sprayer is prepared for spraying by adding the pre-slurried contents of a 4 pound bag of Spike 80DF and water to the tank. Fill to capacity with additional water and shake vigorously. Equip the Solo sprayer with a 0003-SS straight stream nozzle and the Solo pressure regulator with the green (10 psi) pressure limiting spring. To band Spike 80DF at 5 pounds per acre, walk at 3 mph (264 feet per minute) with the Solo on continuously and space the bands 5 feet apart. Adjust the rate and walking speed according to the brush species and conditions encountered. For individual plant treatment with the Solo, apply a 1.5 second shot for every 1 to 2 inches of stem diameter at the base of unwanted woody plants.

The Spot Gun is prepared for individual plant treatment by mixing 2 pounds of Spike 80DF in sufficient water to obtain 1 gallon of spray solution. Set the Spot Gun to deliver 8 milliliters of this solution for every 1 to 2 inches of stem diameter at the base of the unwanted woody plants. For application on steep slopes or other sensitive areas, the Spot Gun can be equipped with a soil probe to inject the Spike 80DF solution beneath the soil surface. Placement at a soil depth of 2 to 4 inches will eliminate any surface movement and reduce injury to herbaceous vegetation.

At the prescribed rates, a 4 pound bag of Spike 80DF will treat approximately 950 stems 1 to 2 inches in diameter. Because of its non-volatile nature and low potential for drift, this Spike application technique can be used for treating unwanted woody plants on non-cropland areas adjacent to sensitive crops (See Precautions and Restrictions section). Use of a colored marker or dye in spray mixtures will aid in inspection of the completed work.

Factors in Herbicidal Response of Woody Plants

Spike 80DF has little or no foliar activity, but when applied to the soil is readily absorbed by the plant roots along with soil moisture. Effects will not become apparent until there is sufficient rainfall to move the herbicide into the root zone. The time required to achieve control is dependent on soil type, amount and timing of rainfall, and rooting depth of target species. Some species may go through several defoliations and refoliations over a period of approximately two to three years before dying.

Soil Texture, Soil Depth, and Organic Matter

Poor control or erratic results are likely to occur if banded treatments are applied to soils containing more than 5% organic matter or more than 30% clay. Do not apply to "blackland" or other heavy clay soils that crack extensively upon drying. Other deep, medium, and fine-textured soils supporting deep-rooted woody plant species require higher rates within recommended rate ranges for consistent control. Woody plants growing in shallow, coarse, or rocky soils with low organic matter are normally more susceptible due to increased soil availability of the herbicide and shallow rooting depth. Application rates at the low end of the rate range may be used under these conditions.

Woody Plant Size and Density

The height and density of woody vegetation is a reliable indicator of soil conditions. Woody vegetation is generally taller and denser where soils are deep and/or of medium to fine texture and where soil moisture conditions are more favorable. Higher rates in the recommended rate range are required on such sites. Woody vegetation will be smaller and less dense on sites with coarse, shallow, or rocky soils with less favorable soil moisture conditions. Lower rates in the recommended rate range may be used on such sites. Where a high level of woody plant control is required and application rates cannot be adjusted for changes in soils, plant size, or density, apply Spike 80DF at a rate sufficient to control the tallest and most dense woody vegetation in the treatment area.

Application Timing

Spike 80DF may be applied anytime except when the soil is frozen or is saturated with moisture. For optimum results, applications should be made prior to the resumption of active seasonal growth in the spring or before expected seasonal rainfall. In areas receiving greater than 25 inches of annual rainfall, late summer and fall applications may require a higher application rate in the indicated rate range to achieve consistent control.

Banded application of Spike 80DF is recommended for control of brush regrowth after dozing or shredding, provided the regrowth has reached an average height of five feet or more prior to application. Spike 80DF works best when there is an abundance of active leaf area to stimulate soil moisture and herbicide uptake during the season following application. Taller regrowth will tend to respond with faster and more consistent brush control.

Spike 80DF may cause temporary herbicidal symptoms to appear on perennial grasses. Dormant season application is recommended to minimize herbicidal effects on desirable forage grasses.

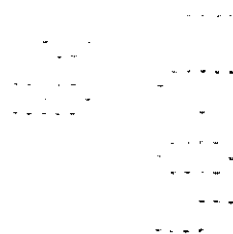
Effect of Shallow Groundwater on Woody Plant Control

Do not apply Spike 80DF to areas where the water table is predominately shallow (5 feet or less), such as marshy or sub irrigated areas, or areas immediately adjacent to streams or lakes which are periodically flooded. On such sites, where roots extend directly to a shallow water table, woody plants are minimally affected by applications of tebuthiuron and poor control will result.

Note: Refer to Environmental Hazards section under Use Restrictions for Ground Water Protection for other rate limitations on "vulnerable" sites.

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R-094-002
EPA-accepted 07-30-2004
Initial printing.



9/13

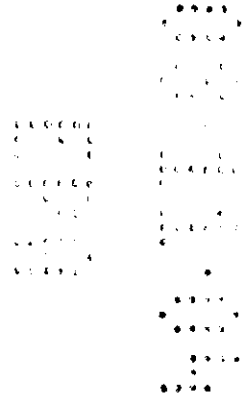
Spike[®] 80DF

EPA Reg. No. 62719-107

Registration Notes:

Notification: Section 3 supplemental labeling entitled "Establishment of Herbicidal Firebreaks in Annual Grasslands" based on EPA-accepted labeling for Spike 80W dated July 30, 2004.

Note: Because of the nature of this use and limited area to which it applies (Eastern Washington and Oregon, Southern Idaho, Northern Utah and Nevada), the use has been removed from the main section 3 label to supplemental labeling.



Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Spike[®] 80DF

EPA Reg. No. 62719-107

Establishment of Herbicidal Firebreaks in Annual Grasslands

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Spike 80DF before applying. Carefully follow all precautionary statements and applicable use directions.
- Except as described below, use of Spike 80DF according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the product container.

Directions for Use

Spike[®] 80DF herbicide may be used for establishment of firebreaks in annual grasslands adjacent to frequently traveled areas or areas with a history of repeated wildfires. Application of Spike 80DF provides residual preemergence control of annual grasses and broadleaf weeds and prevents annual buildup of combustible fuel. Treated strips 40 to 50 feet wide may be established parallel to highways or frequently traveled areas or in a broad-scale grid pattern. Strategic placement of firebreaks can prevent fires from spreading from frequently traveled areas or lightning-caused fires can be confined to the area within a single grid block. Herbicidal firebreaks can also serve as a means of safe passage in case of entrapment during fire-fighting efforts.

This practice is intended for use in rangelands dominated by annual grasses such as *Bromus* and other annual grass species and certain broadleaf weeds prevalent in the Great Basin and Pacific Northwest. When surface applied from mid summer to early fall, Spike 80DF provides residual preemergence control of susceptible annual grasses and broadleaf weeds from early fall through the spring growth period. Depending on application rate, a single application may provide effective annual grass and broadleaf control for 2 years or more. Desirable perennial grasses within treated strips may be temporarily injured, but if not overgrazed, will increase in vigor and density with time.

Broadcast Application Rates: Apply Spike 80DF at a rate of 0.38 to 0.75 lb/acre (0.3 to 0.6 lb ai/acre) in a minimum spray volume of 5 gallons per acre for ground equipment. Use low pressure large droplet herbicide nozzles. Use the lower end of the rate range in areas with coarse to medium textured soils with low organic matter and the higher end of the rate range in areas with medium to fine textured soils, areas with higher organic matter, or where a longer period of control is desired.

Annual Weeds Controlled: Includes *Bromus* spp., downy brome grass or cheatgrass (*Bromus tectorum*), ripgut brome (*Bromus diandrus*), annual mustards, bur buttercup (*Ranunculus testiculatus*) and other annual species

Application Timing: Spike 80DF may be applied from mid summer through early fall (July 15 through October 15). Application should occur prior to or immediately after the onset of germination of target annual weeds. Spike 80DF may be applied 2 to 3 months before germination of target weeds without loss of herbicidal activity. The treatment becomes herbicidally active when there is sufficient rainfall to move the herbicide into the surface soil where germination occurs. Control will be reduced if Spike 80DF is applied after the root systems of target weeds are established and can obtain soil moisture from below the zone of herbicidally active surface soil.

Woody plant control: With time, application rates greater than 0.4 lb/acre of Spike 80DF may provide sagebrush control within treated strips.

Application Techniques and Equipment: Herbicidal firebreaks may be applied with ground equipment. Ground equipment using cluster nozzles may be preferable to conventional ground spray booms in areas of rough terrain. Adjust spray boom to deliver a uniform swath approximately 40-50 feet wide. Treat strips of sufficient width to contain a wild fire in annual grass vegetation normally observed in the area.

Repeat applications may be made at a reduced rate within previously treated strips or application may occur adjacent to treated strips to widen the zone of reduced fuel in case of fire. By treating strips adjacent to previously treated strips, desirable changes in herbaceous perennial vegetation within previously treated strips may be preserved.

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308/2E
August 5, 2004



Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

NOTIFICATION

AUG 18 2004

SPIKE 80DF (AI: TEBUTHIURON)
EPA REGISTRATION NUMBER: 62719-107
NOTIFICATION OF SUPPLEMENTAL LABEL PER PR NOTICE 98-10

Enclosed please find Section 3 supplemental labeling entitled "Banded Application for Woody Plant Control in Rangeland, Permanent Pastures, Fencerows, and Clearings for Wildlife Habitat" based on EPA-accepted labeling for Spike® 80W dated July 30, 2004. Note: In order to facilitate the immediate implementation of this new use for Spike 80DF in key market areas of Texas, Oklahoma and New Mexico, this supplemental labeling will be distributed in these states until product bearing the updated label is fully available in channels of trade.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled Spike 80DF (T1H / Spike 80DF / Notif - Sec 3 Suppl - Banded Application in Range and Pasture / 08-05-04) (7 Pages plus Registration Notes) (5 Copies)

If you require further information, please contact Richard Bjerregaard, Regulatory Specialist at 317-337-4674 or Kim Williamson, Registration Assistant for this product, at 317-337-4657.

Sincerely,

John J. Jachetta, Ph. D.
Regulatory Leader
Regulatory Success - Americas
317-337-4686
317-337-4649 (FAX)

JJJ/kmw

Enclosures

308/2E
August 5, 2004



Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

SPIKE 80DF (AI: TEBUTHIURON)
EPA REGISTRATION NUMBER: 62719-107
NOTIFICATION OF SUPPLEMENTAL LABEL PER PR NOTICE 98-10

Enclosed please find Section 3 supplemental labeling for Spike[®] 80DF, entitled "Establishment of Herbicidal Firebreaks in Annual Grasslands" based on EPA-accepted labeling for Spike 80W dated July 30, 2004. Note: Because of the nature of this use and limited area to which it applies (Eastern Washington and Oregon, Southern Idaho, Northern Utah and Nevada), the use has been removed from the main section 3 label to supplemental labeling.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled Spike 80DF (T1H /Spike 80DF / Notif - Sec 3 Suppl – Chem Firebreaks / 08-05-04)
(2 Pages plus Registration Notes) (5 Copies)

If you require further information, please contact Richard Bjerregaard, Regulatory Specialist at 317-337-4674 or Kim Williamson, Registration Assistant for this product, at 317-337-4657.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Jachera".

John J. Jachera, Ph. D.
Regulatory Leader
Regulatory Success – Americas

317-337-4686
317-337-4649 (FAX)

JJJ/kmw

Enclosures