

01/21/2000

1 of 4

JAN 21 2000

Mr. Steve A. McMaster
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Dear Mr. McMaster:

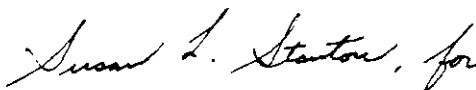
SUBJECT: Supplemental Label with Chemigation Instructions for Dry Beans and
Sunflowers
Sonalan* HFP
EPA Registration No. 62719-188
Your Submission Dated January 6, 2000, as Amended by Email January 21, 2000

The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you correct the following typographical errors:

1. Change the first word of the second paragraph under "Posting Requirement" from "Post" to "Posting".
2. In the third paragraph under "Posting Requirement", change the minimum letter size from "1 1/2 inches tall" to "2 1/2 inches tall" in accordance with PR Notice 87-1.

A stamped copy is enclosed for your records. Submit one copy of the final printed labeling incorporating these changes before you release the product for shipment.

Sincerely yours,



Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure

RD:STANTON:PM Team 23:Rm. 239:CM-2:305-5218:Disk #1:1:S573981.LET

CONCURRENCES

SYMBOL *	7505C							
SURNAME *	S. Stanton							
DATE *	Jan 21, 2000							

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Sonalan* HFP

EPA Reg. No. 62719-188

Chemigation Instructions for Application of Sonalan HFP in Dry Beans and Sunflowers

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 Sonalan HFP before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of Sonalan HFP according to this supplemental labeling is subject to all use precautions and limitations stated below or imposed by the label affixed to the container for Sonalan HFP.

Directions for Use

Sonalan* HFP herbicide may be applied through properly equipped chemigation systems for weed control in dry beans (does not include soybeans), and sunflowers. Refer to "Application by Chemigation" instructions below for use directions for chemigation. Do not apply Sonalan HFP through any type of irrigation system unless these directions are carefully followed.

Application Timing: Planting and application should occur as soon as possible after the last tillage operation. Sonalan HFP must be applied within 2 days after planting prior to crop emergence. Sonalan HFP does not control established weeds. Soil incorporation is not required when Sonalan HFP is applied through chemigation systems.

Broadcast Application Rates for Chemigation Application: Use application rates recommended for "Sonalan HFP - Alone" in the "Dry Beans and Sunflowers" sections of the product label. Apply Sonalan HFP in overhead sprinkler irrigation equal to 1/2 to 1 inch of water and use the maximum recommended application rate for the soil texture class and weed species to be controlled.

Cultivation: Soil treated by chemigation with Sonalan HFP may be shallow cultivated without reducing weed control activity.

General Chemigation Directions:

Apply this product only through continuously moving center pivot, lateral move, or end tow sprinkler irrigation systems equipped for chemigation. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of chemigation treated water.

If you have questions about calibration you should contact state extension specialists, equipment manufacturers, or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system.

Only a person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, should make system adjustments.

ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 21 2000

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719-188

Posting Requirement

Posting of areas to be chemigated is required when: 1) any part of a treated area is within 300 feet of sensitive areas such as residential areas, labor camps, businesses, day care centers, hospitals, in-patient clinics, nursing homes, or any public areas such as schools, parks, playgrounds, or other public facilities not including public roads; or 2) when the chemigated area is open to the public such as golf courses or retail greenhouses.

Post must conform to the following requirements. Treated areas shall be posted with signs at all usual points of entry and along likely routes of approach from the listed sensitive areas. When there are no usual points of entry, signs must be posted in the corners of the treated area and in any other location affording maximum visibility to sensitive areas. The printed side of the sign should face away from the treated area towards the sensitive area. The sign shall be printed in English. Signs must be posted prior to application and must remain posted until foliage has dried and soil surface water has disappeared. Signs may remain in place indefinitely as long as they are composed of materials to prevent deterioration and maintain legibility for the duration of the posting period.

All words shall consist of letters at least 1 ½ inches tall, and all letters and the symbol shall be a color that sharply contrasts with their immediate background. AT the top of the sign shall be the words "KEEP OUT", followed by an octagonal stop sign symbol at least 8 inches in diameter containing the word "STOP". Below the symbol shall be the words "PESTICIDES IN IRRIGATION WATER".

Sprinkler Chemigation Directions:

The following directions must be followed for all recommended sprinkler irrigation systems (center pivot, lateral move, or end tow):

1. The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back-flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch that will stop the water pump motor when the water pressure decreases to the point that pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.
8. Sonalan HFP should be injected continuously throughout the chemigation period. The chemigation metering pump should be checked periodically during application to insure proper operation.
9. The injection metering pump must be calibrated as specified by the manufacturer.
10. Pesticide injection hoses which connect chemigation metering equipment to the sprinkler irrigation system should be of braided reinforced construction with an internal tube made of nylon, cross-linked polyethylene, or high density polyethylene.
11. Apply Sonalan HFP in sprinkler irrigation equal to 1/2 to 1 inch of water.
12. During chemigation, maintain agitation in supply tank at all times.

Note: Sonalan HFP may cause staining of plastic hoses and tanks.

Chemigation System Calibration:

Sample calculation for use of Sonalan HFP in a chemigation system:

- Assume in this example, 133 acres are to be covered by a chemigation treatment.
- Product required, assuming 3.0 pints per acre is 399 pints
(133 acres X 3.0 pt/acre = 399 pt = 50 gallons)
- Add 50 gallons of product directly to the injection supply tank.
- Adjust the injection system to deliver 50 gallons during the time required to apply 1 inch of water to 133 acres.

If the irrigation system requires 20 hours to apply 1 inch of water to 133 acres, the injection rate is 2.5 gal/hr and is calculated as follows:

- $50 \text{ gal} \div 20 \text{ hr} = 2.5 \text{ gal/hr}$
 $2.5 \text{ gal/hr} = 320 \text{ fl oz/hr}$

Proper calibration of the injection pump requires that it be adjusted to deliver 5.33 fl oz per minute and is calculated as follows:

- $320 \text{ fl oz/hr} \div 60 \text{ min./hr} = 5.33 \text{ fl oz per min}$

Chemigation Mixing Directions:

Undiluted Sonalan HFP: When used alone, the injection of undiluted Sonalan HFP is recommended in chemigation systems. For undiluted use, the metering pump, supply tank, and any associated equipment must be thoroughly clean and dry before Sonalan HFP is added to the system for injection. When injecting undiluted Sonalan HFP, maintain continuous agitation in the supply tank.

Diluted Sonalan HFP: Sonalan HFP may be diluted if required to achieve accurate calibration for existing equipment. Partially fill the injection supply tank with a volume of water equal to the amount of Sonalan HFP required (Do not add water to Sonalan HFP). Start agitation. Add the required amount of Sonalan HFP to water in the supply tank and continue mixing while filling the tank to the final volume required by the injection pump calibration. When injecting diluted Sonalan HFP, maintain continuous agitation in supply tank.

General Precautions:

Sonalan HFP, applied in cool, wet conditions, has the potential to cause crop injury as seeds germinate. For best results, apply when weather is warm.

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T1L / Sonalan HFP / Suppl - Chemig Dry Beans and Sunflowers / 01-21-00
D06-042-XXX
EPA-accepted: ___/___/___
Initial printing