Mr. Larry E. Hammond DowElanco 9330 Zionsville Road Indianapolis, IN 46268-1054

Dear Mr. Hammond:

Treflan HFP Subject:

EPA Registration No. 62719-250

Application and Letter Dated December 19, 1996, Request To Amend Pesticide Product Registration, Supplemental Labeling for "The Coulter Caddy as an Option for the Second Incorporation of Fall-Applied Treflan HFP

The proposed amendment described in the subject application has been reviewed. The proposed supplemental labeling as submitted with the subject application is acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended, provided that you:

- 1. Delete all "Editor's Notes" that appear on the proposed labeling.
- 2. Submit one (1) printed copy of the final printed labels before you release the product for shipment under the subject labeling.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, Section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the supplemental label is enclosed for your records.

Sincerely yours,

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

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SURNAME							
DATE		****************		******************]		

EPA Form 1320-1 (12-70)

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with COMMEN In EPA Letter I

Supplemental Labeling

P/DPD1

DowElanco

DowElanco

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Treflan* HFP

(EPA Reg. No. 62719-250)

The Coulter Caddy as an Option for the Second Incorporation of Fall-Applied Treflan HFP

To be used in combination with a grain drill used for broadcast planting of soybeans under reduced or conservation tillage conditions.

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 Treflan HFP before applying. Carefully follow use precautions and applicable use directions.
- Except as described below, use of Treflan HFP according to this supplemental labeling is subject to all
 precautions and limitations imposed by the label affixed to the container for Treflan HFP.

Directions For Use

The product label for Treflan* HFP herbicide allows a single soil incorporated application in the fall or in the spring prior to planting labeled crops. Application may be made to tilled land, standing or chopped stubble from the previous season's crop. The first incorporation of Treflan HFP must occur within 24 hours after application. Under reduced or conservation tillage practices this may be accomplished with a tandem disc or combination tool that can thoroughly mix Treflan HFP into the top 2 to 3 inches of the final seedbed while leaving the desired amount of plant residue on the soil surface. The second incorporation can occur any time prior to or in conjunction with planting the crop and requires tillage equipment that provides uniform soil mixing.

When Treflan HFP is **fall applied**, the second incorporation can be accomplished with a Coulter Caddy system in combination with a grain drill used for broadcast planting of soybeans. The most effective soil mixing using this method is obtained when soils are in good tilth and have moderate soil moisture. For best results, the Coulter Caddy should be equipped and operated as follows:

- 1. Drills should be spaced no more than 8 inches apart.
- 2. Use fluted coulters that are 3/4 to 1 1/4 inches wide.
- 3. Set coulters to penetrate the soil to a depth of 1 1/2 to 2 inches.
- 4. Operate drill a minimum of 6 mph.
- 5. The drill should be followed by a Furst Harrow or Two-bar tine harrow to aid in leveling of the soil and crop residue.

Note: The Coulter Caddy system is not recommended for the second incorporation pass for spring-applied dry bulk fertilizer impregnated with Treflan HFP.

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T2E/Treflan HFP/Supp (Coulter Caddy)/11-18-96 (122-33-134d)EPA-accepted: __/__/__ Replaces 122-33-111.

Revisions:

 Directions for use of coulter caddy for second incorporation of fall applied Treflan HFP revised for clarity.