



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

Ms. Kimberly S. Gilbert
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Dear Ms. Gilbert:

OCT 26 2000

Subject: Scorpion[®] III
EPA Registration No. 62719-264
Application and Letter Signed by Dr. Dennis H. Lade and
Dated October 4, 1999, Request To Amend Registration
To Add Supplemental Labeling To Add the Use of
Impressive BD Adjuvant Applied Alone or in Tank Mixes
Where a Non-ionic Surfactant Is Recommended

The subject request to amend the registration of Scorpion III by adding supplemental labeling has been reviewed and copy of the review is enclosed for your records. The proposed labeling amendment has been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, provided that you:

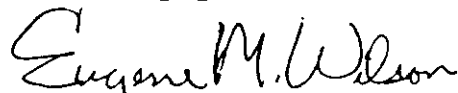
1. Add a use restriction that reads as follows:
 - o If you use this product as directed in this supplemental labeling, you must not apply any other herbicide product that contains the active ingredients, clopyralid and/or flumetsulam, during the crop year, which would exceed an accumulative dosage of a maximum of 0.25 lb a.i./A/ year clopyralid or a maximum of 0.07 lb a.i./A/year flumetsulam.
2. Revise all labeling of crop use products that claim clopyralid and/or flumetsulam by adding a use restriction that will assure that the maximum annual use of the active ingredients clopyralid and/or flumetsulam will not exceed the maximum use rates: 0.25 lb a.i./A/year for clopyralid and 0.07 lb a.i./A/year for flumetsulam. The use restriction must read similar to that stated in 1 above. This may be done by notification, if the use restriction reads similar to that stated in 1 above. A list of the EPA registered pesticide products containing these active ingredients is enclosed for your use.
3. Submit one (1) copy of your final printed labeling prior to your shipment of the subject pesticide product under the enclosed stamped labels.

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 proposed label is enclosed for your records.

Sincerely yours,


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

Enclosures (2)

Supplemental Labeling



Dow AgroSciences LLC, 9300 Zionsville Road, Indianapolis, IN 46268-1054 USA

Scorpion* III

EPA Reg. No. 62719-264

Use of Impressive DB Surfactant with Scorpion III in Field Corn:

- Scorpion III plus 2,4-D for minimum-tillage or no-tillage systems
- Postemergence, alone or in tank mix combination

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 Scorpion III herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- Except as described in this supplemental labeling, use of Scorpion III is subject to all precautions and limitations imposed by the labels affixed to the containers for Scorpion III.

Directions for Use

Impressive DB surfactant may be used with Scorpion III alone or in tank mix combination where a non-ionic surfactant and nitrogen adjuvant is recommended. Use Impressive DB at the rate of 2.25 lb per acre. See applicable sections of the product label below.

Tank Mixing (Preplant Surface Applied, and Postplant Preemergence Treatments)

Scorpion III plus 2,4-D for minimum-tillage or no-tillage systems: Where heavy crop residues exist, add 0.5 to 1.5 pints per acre of an appropriately labeled 3.8 pounds a.e. per gallon 2,4-D amine or ester to the spray tank and apply in a minimum of 20 gallons of carrier per acre.

As carriers, nitrogen solutions and complete liquid fertilizers applied before corn emergence may enhance burndown of existing weeds and, therefore, are recommended instead of water. Add Impressive DB at 2.25 lb/acre or a crop oil concentrate (1 quart per acre), or a non-ionic surfactant at 1 to 2 quarts per 100 gallons of diluted spray, or other appropriate surfactant at its recommended rate. Apply before weeds reach 6 inches in height. This tank mixture will not control emerged grasses.

Postemergence Application

Tank Mixing: Scorpion III may be applied alone or in tank mix combination with other herbicides registered for postemergence application in field corn unless tank mixing is specifically prohibited by the label of the tank mix product. When Scorpion III is tank mixed with a companion herbicide, follow relevant use directions, including precautions, restrictions, and limitations listed on the manufacturer's label.

Use of Surfactants: Use Impressive DB surfactant at 2.25 lb per acre. All applications of Scorpion III must include a non-ionic surfactant at 0.25% volume/volume (1 qt per 100 gal) or a good quality surfactant with at least 80% active ingredient (of which at least 50% is actual non-ionic surfactant). If using Impressive DB, no additional surfactants are required. Under extremely dry growing conditions, use of an agriculturally approved sprayable liquid fertilizer together with the non-ionic surfactant may enhance control. Use 28%, 30%, or 32% urea ammonium nitrate at 2.5% volume/volume (2.5 gal per 100 gal). **Note: Do not use liquid fertilizer solutions or suspensions as the total carrier because excessive crop injury may occur.** Use only surfactants EPA approved for use on food crops.

*Trademark of Dow AgroSciences LLC
P6C /Scorpion III / Prop Sec 3 Supp-Impressive DB / 09-24-99
D06-040-XXX
EPA-accepted: ___/___/___
Initial printing.

Scorpion* III

EPA Reg. No. 62719-264

Registration Notes:

Proposed Section 3 supplemental labeling for use of Impressive DB with Scorpion III alone or in tank mix combination where a non-ionic surfactant is recommended.

*Trademark of Dow AgroSciences LLC

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

OCT 26 2000

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

62719-264

