UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

February 24, 2006

Mr. A. Sterett Robertson, Regulatory Manager Regulatory Success - Americas Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268

Subject: Amendment: Supplemental labeling to add the following new uses:

- · Control of armyworms in legume forages and legume forage grown for seed
- Control of armyworms in grass forages, grass grown for seed, pastures and rangeland
- Foliar insect control in small cereal grains, and to revise PHI and grazing instructions for forage, fodder and hay

Tracer (EPA Reg. No. 62719-267) Your Submissions dated December 17, 2003 and January 25, 2006

Dear Mr. Robertson:

We have reviewed the above referenced submissions, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. We reviewed the five supplemental labels in light of the OPP/HED Risk Assessment document dated September 15, 2005. The proposed amendments are acceptable with the following comments:

• Qualify cereal grains to read "small cereal grains" and under Directions for Use, list only the following "small cereal grains": barley, buckwheat, oats, rye, triticate, and wheat.

	CONC	URRENCES		
SYMBOL . 7505C				
SURNAME · AtuntoSotu		1		l l
DATE - 2/24/06				

At your next label printing, or within eighteen (18) months, whichever comes first, you must incorporate the supplemental labeling into each product's main labeling. Stamped copies of the labels are enclosed for your records.

If you have any questions concerning this action, please contact Dr. B. A. Akinlosotu at (703) 605-0653.

Sincerely,

George T. LaRocca, Product Manager 13

Insecticide Branch

Registration Division (7505C)

Enclosure:

T6P / Tracer / Prop IR-4 Sec 3 Supp Legume Forages-Legumes Grown for Seed / 01-16-06 file: R066-001 Tracer Sec 3 Armyworm Control Legume Forages-Legumes Grown for Seed 16Jan06d.doc

Tracer®
EPA Reg. No. 627/19-267

Proposed Section 3 supplemental labeling.

*Trademark of Dow AgroSciences LLC

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Tracer®

EPA Reg. No. 62719-267

For Control of Armyworms in Legume Forages (including but not limited to Alfalfa, Clover, Lupin and Vetch) and Legume Forage Grown for Seed

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its lab eling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Tracer Naturalyte insect control before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of Tracer according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Tracer.

Directions for Use

Refer to product label for Tracer for General Use Precautions, Mixing and Application Instructions.

Pests and Application Rates:

Pests	Rate (fl oz/acre)	Active Ingredient (lb/acre)
beet armyworm	1 - 2	0.031 - 0.062
fall armyworm	,	
southern armyworm		
true armyworm		

Specific Use Directions:

Application Timing: Scout at least weekly and consider the impact of both pests and beneficials. Treat when economic thresholds are exceeded, targeting eggs at hatch or small larvae. Heavy infestations may require repeat applications, but follow resistance management guidelines on the product label. Consult your Dow AgroSciences representative, extension service specialist, certified crop advisor or your state agricultural experiment station for any additional recommendations applicable to your area.

Application Rate: Use a higher rate in the rate range for heavy infestations or advanced growth stages of target pests.

Resistance Management: For resistance management, do not apply Tracer more than 3 times in any 21-day period. Rotate to a different class of insect control products or use no treatment for the next 21 days. Do not apply more than 6 treatments per season. If Tracer is applied 3 times in succession, do not apply again for at least 21 days.

Restrictions:

- Preharvest Interval: Do not harvest hay or fodder for 3 days after treatment. There is no preharvest interval for forage.
- Do not allow cattle to graze from treated area until spray has dried.
- Do not apply more than 6 fl oz of Tracer (0.186 lb ai spinosad) per acre per season.

Note: This product is toxic to bees exposed to treatment for 3 hours following treatment and toxic to aquatic invertebrates. Refer to the Environmental Hazards section of the product label attached to the product container for required protective measures.

Trademark of Dow AgroSciences LL	.C
R066-001	
Accepted://	
Initial printing.	

ACCEPTED
with COMMENTS
In EPA Letter Dated:

FEB 24 200G

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

627 - PIFGO

T6P / Tracer / Prop Sec 3 Supp Grass Forage-Grass for Seed-Pastures-Rangeland / 01-16-06 file: R066-010 Tracer Sec 3 Armyworm Control Grass Forage-Grass for Seed- Pastures-Rangeland 16Jan06d.doc

Tracer[®]

EPA Reg. No. 62719-267

Proposed Section 3 supplemental labeling.

®Trademark of Dow AgroSciences LLC

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Tracer®

EPA Reg. No. 62719-267

For Control of Armyworms in Grass Forages, Grass Grown for Seed, Pastures and Rangeland

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 posse ssion of the user at the time of application.
- Read the label affixed to the container for Tracer Naturalyte insect control before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of Tracer according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Tracer.

Directions for Use

Refer to product label for Tracer for General Use Precautions, Mixing and Application Instructions.

Pests and Application Rates:

Pests	Rate (fl oz/acre)	Active Ingredient (Ib/acre)
beet armyworm fall armyworm southern armyworm true armyworm	1 - 2	0.031 - 0.062

Specific Use Directions:

Application Timing: Scout at least weekly and consider the impact of both pests and beneficials. Treat when economic thresholds are exceeded, targeting eggs at hatch or small larvae. Heavy infestations may require repeat applications, but follow resistance management guidelines on the product label. Consult your Dow AgroSciences representative, extension service specialist, certified crop advisor or your state agricultural experiment station for any additional recommendations applicable to your area.

Application Rate: Use a higher rate in the rate range for heavy infestations or advanced growth stages of target pests.

Resistance Management: For resistance management, do not apply Tracer more than 3 times in any 21-day period. Rotate to a different class of insect control products or use no treatment for the next 21 days. Do not apply more than 6 treatments per season. If Tracer is applied 3 times in succession, do not apply again for at least 21 days.

Restrictions:

- Preharvest Interval: Do not harvest hay or fodder for 3 days after treatment. There is no preharvest interval for forage.
- Do not allow cattle to graze from treated area until spray has dried.
- Do not apply more than 6 fl oz of Tracer (0.186 lb ai spinosad) per acre per season.

Note: This product is toxic to bees exposed to treatment for 3 hours following treatment and toxic to aquatic invertebrates. Refer to the Environmental Hazards section of the product label attached to the product container for required protective measures. **ACCEPTED**

*Trademark of Dow AgroSciences LLC R066-010 Accepted: __/__/__ Initial printing.

with COMMENTS
In EPA Letter Dated:

FEB 24 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. T6P / Tracer / Prop Sec 3 Supp Small Grains / 01-17-06
File: R066-012 Tracer Sec 3 Foliar Insect Control in Small Grains 17Jan06d.doc

Tracer[®]

EPA Reg. No. 62719-267

Proposed Section 3 supplemental labeling for use of Tracer for foliar insect control in cereal grains to reduce PHI to 3 days for forage, fodder and hay.

[®]Trademark of Dow AgroSciences LLC

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Tracer[®]

EPA Reg. No. 62719-267

For Foliar Insect Control in Cereal Grains[†]

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 affix ed to the container for Tracer® Naturalyte® insect control before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of Tracer according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Tracer.

Directions for Use

[†]Cereal grains: Barley, Buckwheat, Grain Amaranth, Milo, Oats, Pearl Millet, Proso Millet, Rye, Sorghum, Triticale, Wheat

Refer to product label for Tracer for General Use Precautions, Mixing and Application Instructions.

Pests and Application Rates:

Pests	Tracer (fl oz/acre)
cereal leaf beetle	1 - 3
armyworms corn earworm (headworm) grasshoppers (suppression) southwestern corn borer webworms	1.5 - 3

Specific Use Directions:

Application Timing: Scout for **armyworms** and **headworms** with enough regularity to monitor egg laying and egg hatch and treat when thresholds are reached. Applications of Tracer should be timed to coincide with peak egg hatch of each generation.

Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in the rate range for heavy infestations and/or difficult spray coverage situations.

Restrictions:

- Do not apply more than 9 fl oz of Tracer (0.28 lb a.i. of spinosad) per acre per year.
- Preharvest Interval: Do not apply within 21:days of grain or straw harvest or within 3 days of forage, fodder or hay harvest. Note: The 3 day PHI for forage or hay harvest supercedes the previous PHI of 14 days.
- Do n ot allow cattle to graze treated area until spray has dried.

Note: This product is toxic to bees exposed to treatment for 3 hours following treatment and toxic to aquatic invertebrates. Refer to the Environmental Hazards section of the product label attached to the product container for required protective measures.

"Trademark of Dow AgroSciences LL	٠.
R066-012	
Accepted://	
Initial printing.	

ACCEPTED with COMMENTS In EPA Letter Dated:

FEB 2 4 2006

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