

62719-292

12/27/2000

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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

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Registration
Amendment
Other

OPP Identifier Number

278304

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-292	2. EPA Product Manager George T. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Success*	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	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

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated	NOTIFICATION DEC 27 2000
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Supplemental label notification for additional chemigation instructions for drip irrigation.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
*Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Other (Specify)
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other			

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. (Include Area Code) (317) 337-4685	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowing false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					3. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Manager			
4. Types Name John J. Jachetta, Ph.D.		5. Date December 11, 2000			
* Trademark of Dow AgroSciences LLC					

T6P / Success / Suppl-Chemig Instruct for Drip Irrigation / 12-08-00

Success*

62719-292

Registration Notes:

Proposed Section 3 Supplemental Labeling: Application by via drip irrigation systems is extended to all labeled crops listed in the product label for Success, but limited to use under the direction of a Dow AgroSciences representative or approved cooperator.

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NOTIFICATION

DEC 27 2003

DEC 27 2003

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success*

EPA Reg. No. 62719-292

Additional Chemigation Instructions for Drip Irrigation

(This supplemental labeling is intended for use only under the direction of a Dow AgroSciences representative or approved cooperators.)

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

Directions for Use

Application by Chemigation

Drip Irrigation: Success* Naturalyte* insect control may be applied by drip irrigation to control labeled pests in labeled crops.

Sprinkler Irrigation: Success may be applied through overhead sprinkler irrigation systems in the following crops: potatoes, and sweet corn. Follow general and specific use directions for these labeled crops in the product label for Success.

Use Precautions and Restrictions:

- Do not apply Success by chemigation to other labeled crops, except as specified in Success product labeling, supplemental labeling or product bulletins.
- Application of Success by drip irrigation systems should be limited to coarse-textured soils with low organic matter content. Product effectiveness will be reduced in soils with significant clay or organic matter.
- Do not tank mix Success with other pesticides or agricultural products when applying through drip irrigation systems.
- If Success is applied by drip irrigation, do not make broadcast foliar applications of Success during the crop cycle.

General Directions for Drip Irrigation:

Success may be applied through surface or buried drip systems or micro-sprinklers. Drip irrigation application procedures in this supplemental labeling are designed to minimize soil adsorption and maximize the bio-availability of Success to target pests. For best results, the application should be made in conjunction with continuous drip irrigation or a normal drip irrigation cycle as described in the following steps:

1. **Pre-irrigation:** Moderate pre-irrigation is required. Soil in the vicinity of emitters should be at or above field capacity prior to injection of Success.
2. **Application Rate:** Apply an amount equivalent to the labeled broadcast application rate for the labeled crop.

3. **Injection:** Prior to injection, the drip irrigation system should be fully charged and in operation. Injection of Success should occur without interruption following pre-irrigation. Mix Success in a dilution volume sufficient for a 1 to 4 hour injection period based on the system calibration. The mixture in the injection system supply tank should be agitated continuously throughout the injection cycle. The diluted mixture of Success should be injected into the center of the irrigation water stream using a suitable dip tube to encourage thorough mixing and even distribution within the drip irrigation system. This is especially important if flow is slow or laminar.
4. **Irrigation following Injection:** Irrigation should be continued for sufficient time to completely flush the mixture of Success from the system and complete the irrigation cycle. Subsequent irrigation should be continuous or, if cyclic, timed to avoid significant drying of soil within the wetting zone of emitters. Irrigation should not be excessive so as to wet the soil beyond the root zone.

Special Requirements for Chemigation Application Equipment

1. Crop injury or lack of effectiveness can result from non-uniform distribution of treated water.
2. If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers, or other experts.
3. Do not connect irrigation system used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
4. Only a person knowledgeable of the chemigation system and responsible for its operation, or a person under the supervision of the responsible person, shall operate the system and make necessary adjustments should the need arise.
5. The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent back-flow contamination of the water source.
6. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the chemical supply or injection pump.
7. The pesticide injection pipeline must also contain a functional, normally closed, automatic 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.
8. The system must contain a functional inter-lock to automatically shut off the pesticide injection pump, if or any reason, the water pump is stopped.
9. 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 where pesticide distribution is adversely affected.
10. Injection systems must use a metering pump, such as a positive displacement injection pump or diaphragm pump, venturi system, or a pressure-safe cylinder containing InLine equipped with a metering valve and flow meter. This equipment must be constructed of materials that are compatible with this product and capable of being fitted with a system interlock.

System Calibration and Application:

1. To insure uniform mixing of Success into the water line, inject the mixture through a nozzle placed in the fertilizer injection port or just ahead of an elbow or tee in the irrigation line so that the turbulence created at those points will assist in mixing. It is suggested that the injection point be higher than the insecticide tank to prevent siphoning.
2. The tank holding the insecticide mixture should be large enough to allow the system to complete an application cycle with 1 filling. It should be clean and free of foreign material, and equipped with an in-line strainer situated between the tank and the injector pump.
3. In order to calibrate the irrigation system and injector to apply the mixture containing Success, determine the following: 1) The number of acres to be irrigated; 2) Set the irrigation rate and determine the number of minutes required for the system to cover the intended treatment area; 3) Calculate the total gallons of insecticide mixture needed to cover the desired acreage. Divide the total gallons of insecticide mixture by the number of minutes required to cover the treatment area. This value is output that the injector must deliver in gallons per minute. Convert the gallons per minute to milliliters or ounces per minute (1 gallon = 3,784 ml). Calibrate the injector pump with the system in operation at the desired irrigation rate. Verify the system calibration before application and monitor during application.

5. Follow WPS reentry requirements for Success. (See "Agricultural Use Requirements" box in product label booklet.)

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Initial printing.