PLEASE NOTE

This image contains more than one label approved for this product on this date.

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NEXT

LABEL

03/01/2006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

March 1, 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:

- Foliar insect control or suppression in bulb vegetables
- Foliar insect control or suppression in mint
- · 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 revise PHI and grazing instructions for forage, fodder and hay

Success (EPA Reg. No. 62719-292) Your Submissions dated November 4, 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.*

CONCURRENCES					
SYMBOL + 7505C					
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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:

Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success[®]

EPA Reg. No. 62719-292

Foliar Insect Control or Suppression in Bulb Vegetables (Crop Group 3[†])

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[®] Naturalyte[®] insect control 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

[†]Bulb vegetables (Crop Group 3) including, but not limited to: Dry Bulb Onion, Garlic, Great-Headed (Elephant) Garlic, Green Onion, Leek, Shallot, Welch Onion

Refer to product label for Success for General Use Precautions, Mixing and Application instructions.

Pests and Application Rates:

Pests	Success (fl oz/acre)	Specific Use Restriction
armyworms dipteran leafminers European corn borer fleabeetle loopers	3 – 6 (0.045 – 0.09 lb ai/acre)	Do not apply more than a total of 29 fl oz of Success (0.45 lb ai of spinosad) per acre per crop or make more than 5 applications per calendar year.
thrips (suppression) [†]	4 - 8 (0.06 - 0.12 lb ai/acre)	

^rControl of thrips may be improved with the addition of an adjuvant to the spray mixture. See Use of Adjuvants under Mixing on the product label. If thorough coverage is desired, then high pressure (>70 psi) directed sprays with dual directed nozzles can assist leaf penetration of onion.

Specific Use Directions:

Application Timing: For determining when to treat, scout with enough regularity to monitor the population size of each of the labeled pests. Treat when pests appear, targeting eggs at hatch or small larvae. Consult your Dow AgroSciences representative, extension specialist, certified crop advisor or your state agricultural experiment station for any additional local use recommendations for your area.

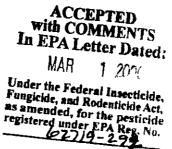
Application Rate: Apply as a foliar spray at the rate indicated for target pest. Use a higher rate in specified rate range for larger larvae or heavier infestations.

General Use Restrictions:

- Minimum Re-treatment Interval: Do not make applications less than 4 days apart.
- · Pre -harvest Interval: Do not apply within 1 day of harvest

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.

³⁰Trademark of Dow AgroSciences LLC R065-005 EPA-accepted __/_/_ Initial printing.



Dow AgroSciences

Dow AgroSciences LLC

Labeling

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success[®]

EPA Reg. No. 62719-292

For Foliar Insect Control or Suppression in Mint

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 [®] Naturalyte[®] insect control 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

Refer to product label for Success for General Use Precautions, Mixing and Application instructions.

Pests and Application Rates:

Pests	Success (fl oz/acre)
armyworms cutworms leafminers loopers thrips (suppression) [†]	4 10 (0.06 0 16 lb ai/acre)

[†]Control of thrips may be improved with the addition of an adjuvant to the spray mixture. See Use of Adjuvants under Mixing on the product label. Control in mint has been variable; high pressure directed sprays can assist leaf penetration of mint.

Specific Use Directions:

Application Timing: For determining when to treat, scout with enough regularity to monitor the population size of each of the labeled pests. Treat when pests appear, targeting eggs at hatch or small larvae. Consult your Dow AgroSciences representative, extension specialist, certified crop advisor or your state agricultural experiment station for any additional local use recommendations for your area.

Application Rate: Apply Success as a foliar spray at the rate indicated to control target pests. Heavy infestations may require repeat applications, but follow resistance management guidelines. Use a higher rate in specified rate range for larger larvae or heavier infestations.

Resistance Management: For resistance management purposes, do not apply more than 3 times in any 30-day period. Rotate to a different class of insect control products or use no treatment for the next 30 days. Do not make more than 4 applications per crop

Specific Use Restrictions:

- Do not apply more than a total of 29 fl oz of Success (0.45 lb ai spinosad) per acre per crop or make more than 3 applications per calendar year.
- Minimum Re-treatment Interval: Do not make applications less than 4 days apart.
- Pre -harvest Interval: Do not apply within 7 days of harvest.

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 LLC

R065-006 EPA-accepted __/_/__ Initial printing.

ACCEPTED with COMMENTS In EPA Letter Dated:

MAR 1 2006 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. (227/9 - 29.0)



Dow AgroSciences LLC

Labeling

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success[®]

EPA Reg. No. 62719-292

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 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 [®] Naturalyte[®] insect control 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

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

Pests and Application Rates:

Pests	Rate (fl oz/acre)	Active Ingredient (lb/acre)
beet armyworm fall armyworm southern armyworm true armyworm	2 - 4	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 Success 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 Success 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 12 fl oz of Success (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 LLC R065-002 EPA-accepted __/_/__ Initial printing.

ACCEPTED with COMMENTS In EPA Letter Dated:

MAR 1 2006

Under the Federal Insecticide, Fungicide, and Rodentickle Act, as amended, for the pesticide registered under EPA Reg. Na. 6 2719 - 299

Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success[®]

EPA Reg. No. 62719-292

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 possession of the user at the time of application.

• Read the label affixed to the container for Success "Naturalyte" insect control before applying. Carefully follow all precautionary statements and applicable use directions.

 Use of Success accord ing 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

Refer to product label 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	2 - 4	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 Success 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 Success 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 12 fl oz of Success (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 LLC R065-007 EPA-accepted __/_/_ Initial printing.

ACCEPTED with COMMENTS In EPA Letter Dated:

2(Y)MAR 1 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

62719-292



Dow AgroSciences LLC

Labeling

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success[®]

EPA Reg. No. 62719-292

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 a ffixed to the container for Success[®] Naturalyte[®] insect control 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

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

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

Pests and Application Rates:

Pests	Success (fl oz/acre)
cereal leaf beetle	2 - 6
armyworms corn earworm (headworm) grasshoppers (suppression) southwestern corn borer webworms	3 – 6

Specific Use Directions:

Application Timing: Scout for armyworms with enough regularity to monitor egg laying and egg hatch and treat when thresholds are reached. Applications of Success perform best when timed to coincide with peak egg hatch and/or small larval stage of growth 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, advanced growth stages of target pests, or difficult spray coverage situations.

Restrictions:

- Do not apply more than 19 fl oz of Success (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 not 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 LLC R065-008 Accepted. __/__/__ Initial printing.

ACCEPTED with COMMENTS In EPA Letter Dated:

RYE $1 \lambda \alpha$ Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

03/01/2006

March 1, 2006

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

Subject: Amendment: Supplemental labeling to revise PHI for Stone Fruit Crops

Success (EPA Reg. No. 62719-292) Your Submission dated November 3, 2003

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 supplemental label in light of the OPP/RD Analytical Chemistry and Residue Data Review (D304416) dated February 14, 2005. The proposed amendment is acceptable with the following comments:

• Under Restrictions in the Directions for Use, revise the statement under Pre-harvest Interval to read "Do not apply within 7 days of harvest for cherries, plums, prunes, and other stone fruit crops, within 14 days of harvest for nectarines".

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. See enclosed stamped copy of the label for your records.

	CONCURRENCES	
SYMBOL · 7505C		
SURNAME ALANDER		······
DATE 3100		

OFFICIAL FILE COPY

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:

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Success*

EPA Reg. No. 62719-292

Foliar Insect Control in Stone Fruits[†]

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* Naturalyte* insect control 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

[†]Stone fruits including, but not limited to: Apricots, Cherries, Nectarines, Peaches, Plums, Prunes

Refer to product label for Success for General Use Precautions, Mixing and Application instructions.

Pests and Application Rates:

	Rate of Success		
Basta		Dilute Spray	
Pests	(fl oz/acre)	(fl oz/100 gal)	
cherry fruit fly	4 - 8	1-2	
green fruitworm			
leafminers (such as			
spotted tentiform,			
western tentiform) [†]			
leafrollers (such as			
oblique-banded			
fruit tree			
pandemis			
redbanded			
variegated)			
Oriental fruit moth		i i	
peach twig borer			
thrips [†]			
western cherry fruit fly			

ACCEPTED with COMMENTS In EPA Letter Date:: MAR 1 2006 Under the Federal Insecticide, Fungicide, and Mederaticide Act, as amended, for the pesticide registered under EPA Reg. Pt.

Control of leafminers and thrips may be improved by addition of an adjuvant to the spray mixture. See Use of Adjuvants section under Mixing.

Specific Use Directions:

Application Timing: Peach twig borer applications can be made dormant, delayed dormant or as summer sprays. Optimal timing for **leafminers** and **leafrollers** may vary between species and geographic location. For **leafminers**, monitor the moth flights and infestation densities of both the sap-feeding and tissue-feeding stage, but for optimal control, treat before significant tissue-feeding mines are observed. For **leafrollers**, monitor the moth flights and the infestation densities of the larval stages. Repeat application as necessary to maintain control and ensure thorough coverage for optimal control. For **oriental fruit moth**, no more than 10 days of residual control can be expected. If longer residual is required, make a second application of Success or other insecticide labeled for **oriental fruit moth**.

Consult with your Dow AgroSciences representative, state agricultural experiment station, certified pest control advisor or extension specialist for specific application timings in your area.

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Application Rate: Choose a higher rate in the rate range for large trees, heavy infestations, or advanced growth stages of target pest, especially if spray volume or coverage is marginal.

Spray Volume: Dilute sprays are sprayed to the point of runoff. The application rate range in the table is based on a spray volume of 300 gallons per acre. Gallonage of dilute sprays will vary depending on tree size, density of canopy, stage of seasonal growth, and spacing in the orchard.

Restrictions:

- Do not apply more than 29 fl oz of Success (0.45 lb a.i. of spinosad) per acre per year.
- Preharvest Interval: Do not apply within 7 days of harvest for cherries, plums, and prunes, within 14 days of harvest for peaches and apricots, or within 1 day of harvest for nectarines. Note: The 1 day PHI for nectarines supercedes the previous PHI of 14 days.

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 LLC R065-001 EPA-accepted ___/__/__ Initial printing.