

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

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

June 5, 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 new uses per approved IR-4 tolerances' petition: Banana

and Plantain (PP 3E6699)

Entrust (EPA Reg. No. 62719-282) Success (EPA Reg. No. 62719-292)

Your submissions dated March 2, 2004 and March 21, 2005

Dear Mr. Robertson:

The amendments referred to above, submitted in connection with registrations under FIFRA Section 3(c)(7)(B), as amended, is acceptable.

Please note that there are outstanding data associated with the conditional registration of this active ingredient, specifically a 28-day inhalation study in rats. Indicate when this study will be submitted. Also based on our occupational exposure assessment (dated September 15, 2005), the MOE for mixer/loaders using the Entrust WP product exceed the Agency's level of concern. Thus, revise the PPE section by requiring mixer/loaders to wear an approved dust/mist filtering respirator (see PR Notice 98-9 for details on specific language).

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 labels for your records.

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

Sincerely.

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

For Foliar Insect Suppression of Thrips in Banana and Plantain

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 u ser 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:

	Rate of Success	
Pests	(fl oz/acre)	Dilute Spray (fl oz/100 gal)
banana rust thrips [†] caterpillars Hawaiian flower thrips [†]	8	3.3

[†]Control of thrips may be improved by addition of an adjuvant to the spray mixture. See Use of Adjuvants section under Mixing on main label. Dilute sprays assume an average volume of 300 gallon per acre.

Specific Use Directions:

Application Timing: Apply no later than 2 weeks after bunch emergence and before flower petals senesce and again 1-2 days before bunch cover.

Application Rate: Apply as a directed fine spray toward bunches and spray to run-off.

Specific Use Restrictions:

- Do not apply more than 29 fl oz of Success (0.45 lb a.i. spinosad) per acre per crop or make more than 4 applications per crop. ✓
- Pre -harvest Interval: Do not apply within 8 weeks of harvest."
- Minimum Re-treatment Interval: Do not make applications less than 7 days apart.
- Chemigation: Do not apply through any type of irrigation equipment.

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 R065-009 EPA accepted: __/__/_ Initial printing

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

with COMMENTS In EPA Letter Dated: