

62719-480

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

FEB 2 2007

Dr. John Jachetta
Dow AgroSciences
Indianapolis, IN 46268

Subject: Surmount Herbicide
EPA Registration No. 62719-480
Supplemental labeling for control of prickly pear on rooftops submitted January
11, 2008

Dear Dr. Jachetta:

The amended labeling referred to above is acceptable provided that you adhere to the following conditions:

- Make all of the changes specified on in the document "Summary of Comments on Microsoft Word -R198-004 Surmount Rooftop 11Jan08d.doc"
- Submit two copies of final printed labeling within 30 days of receipt of this letter.

A stamped copy of the label is enclosed for your records. If you have any questions about this letter, you may call Tobi Colvin-Snyder at 703-305-7801.

Sincerely,

A handwritten signature in black ink that reads "Tobi Colvin-Snyder for".

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Summary of Comments on Microsoft Word - R198-004 Surmount Rooftop 11Jan08d.doc

Page: 1

Author: tsnyder
Subject: Replacement Text
Date: 1/23/2008 9:02:26 AM
T specified

Author: tsnyder
Subject: Comment on Text
Date: 1/23/2008 9:05:35 AM
T This is acceptable as written; however it would be preferable to include this in the text of the table as "Prickly pear - large and/or dense brush".

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Page: 2

Author: tsnyder

Subject: Cross-Out

Date: 1/23/2008 9:09:03 AM

F Since prickly pear is the only weed controlled, this is not necessary and is a bit confusing (implies other weeds are controlled, but no directions/rate provided for other weeds).

FEB 2 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719-480

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Surmount™

EPA Reg. No. 62719-480

Ground Applications On or Around Earthen Roof-Tops

(For Distribution and Use Only within the State of Alabama)

ATTENTION

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

This supplemental labeling only permits use by Federal or State Authorities, or those under their supervision, for the ground applications and individual plant applications of Surmount™ herbicide for the control of Opuntia (prickly pear) cactus growing on or around earthen roof-tops.

Directions for Use

Apply Surmount when conditions are favorable for active growth, but only after leaves are fully expanded and terminal growth has slowed. Adequate soil moisture before and after treatment as well as healthy foliage at the time of application is important for optimal effectiveness. Avoid application during cold weather. Application is recommended when daily maximum air temperature has exceeded 50°F for three consecutive days.

Broadcast Application

Apply as recommended in the table below in 10 or more gallons per acre by ground equipment. Use higher spray volumes to ensure adequate foliar coverage. A nonionic surfactant or liquid fertilizer at 1-2 quarts per 100 gallons spray solution (0.25% – 0.5% v/v) may improve woody plant control for either broadcast or spot application, especially if plants are drought-stressed. To minimize spray drift, a drift control and deposition aid cleared for application to growing crops is also recommended.

Recommendations for Specific Woody Plants:

Woody Plants Controlled	Broadcast Rate (pt/acre)	Application Timing:
Prickly pear	3 – 4 [†]	Avoid application in extremely cold weather. Fall application usually most effective. Do not spray when pads or stems are wet. Mechanical injury that punctures the surface of prickly pear pads or stems immediately before application may improve control. Die back of prickly pear will be slow, and can take up to 2 to 3 years.

[†] Increase the rate to 6 pints per acre if brush is large and/or dense.

Individual Plant Treatment

Application: Apply with a backpack or power sprayer using sufficient spray pressure to provide uniform plant coverage without forming a mist and direct spray no higher than tops of target woody plants. Use sufficient spray volume to uniformly wet all leaves, stems, and root collars (pad surfaces and stems in the case of prickly pear or other cactus), but avoid runoff. To minimize spray drift, a drift control additive approved for growing crops is recommended. A dye marker may be added to the spray mixture as a means of marking treated plants. Use of a nonionic surfactant at the recommended rate (usually 0.25% to 0.5% v/v) may improve herbicidal efficacy and is recommended.

Prickly pear: Use a 0.5% to 1.0% v/v solution of Surmount in water. A coarse droplet size applied with an adjustable cone nozzle is recommended. Application may be made any time of year, but fall application may be most effective. Treatment effects are slow to appear and total plant kill may require 2 to 3 years. Do not spray when the plants are wet. Mechanical injury such as bruising or puncturing of the prickly pear pad surfaces may speed up and improve control.

Mixing Chart for High-Volume Foliar Spray			
(Label rate range is 0.5 to 1 gallons per 100 gallons or 0.5 to 1% v/v)			
Total Volume of Spray Mixture (gallons)	Amount of Herbicide Required at Specified Rate		Amount of Surfactant
	0.5 gal/100 gal (0.5% v/v)	1 gal/100 gal (1% v/v)	(0.25% v/v)
400	2 gal	4 gal	1 gallon
100	2 qt	4 qt	1 qt
50	2 pt	4 pt	1 pt
25	1 pt	2 pt	8 fl oz
14	9 fl oz	18 fl oz	4.5 fl oz
10	6.4 fl oz	12.8 fl oz	3.2 oz
5	3.2 fl oz	6.4 fl oz	1.6 fl oz
3	2 fl oz	4 fl oz	1 fl oz

Cleaning Instructions for Spray Equipment

To avoid injury to desirable plants, equipment used to apply Surmount should be thoroughly cleaned before reusing to apply any other chemicals.

1. Rinse and flush application equipment thoroughly after use. Flush the entire system at least three times with water, and dispose of rinse water in non-cropland area away from water supplies.
2. During the second rinse, add 1 qt of household ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15 to 20 min.). Let the solution stand for several hours, preferable overnight.
3. Flush the solution out the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Nozzles and screens should be removed separately.

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R198-004

EPA accepted: / /

Initial printing.