



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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

February 21, 2007

Dr. Rafael Herrera  
Regulatory Manager  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

RE: AI - PENOX SULAM : AMENDED MAIN LABEL REQUESTS FOR PRODUCTS WITH EPA REG. NOS. 62719-501, 62719-503, AND 62719-514, ADMIN. LETTERS DATED 11/13/2006, 11/28/2006, AND 11/15/2006, RESPECTIVELY. AMENDED SUPPLEMENTAL LABEL REQUEST FOR PRODUCT WITH EPA REG. NO. 62719-514, ADMIN. LETTER DATED 11/16/2006.

Your amended main label requests for products with EPA Reg. Nos. 62719-501 (GRANITE GR), 62719-503 (GRASP GR), and 62719-514 (GRANITE SC), accompanied by Administrative Letters dated 11/13/2006, 11/28/2006, and 11/15/2006, respectively, are approved with comments.

- **The statement "Do not apply where runoff or irrigation water may flow directly onto agricultural land other than rice fields" will remain on the amended main labels.**
- Under "Limitation of Remedies", change "To the extent permitted by law" to "To the extent consistent with applicable law." The change is to conform to language as allowed by EPA's Office of General Counsel.

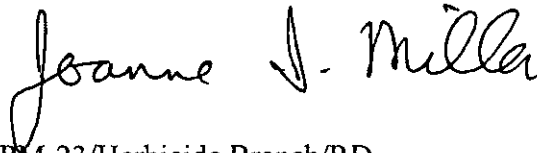
For Product with EPA Reg. No. 62719-514, under "General Use Precautions and Restrictions", add back "Do not permit spray mists containing Granite SC to drift onto desirable broadleaf plants." This restriction was removed by Notification received November 15, 2005, which limited restriction to commercial crops/plants only.

Your amended supplement label with EPA Reg. No. 62719-514, accompanied by Administrative Letter dated 11/16/2006 is also approved.

A stamped copy of the approved labels with comment are enclosed for your records.

For additional assistance in this matter, please contact Phil Errico at 703-305-6663.

Regards,

A handwritten signature in cursive script that reads "Joanne J. Miller". The signature is written in black ink and is positioned above the typed name.

Joanne Miller, PM-23/Herbicide Branch/RD

3 8 5

# Supplemental Labeling



**ACCEPTED**  
*February 21, 2007*  
Under the Federal Insecticide, Fungicide, and Rodenticide Act.  
EPA Reg. No. 62719-514

Dow AgroSciences LLC      9330 Zionsville Road      Indianapolis, IN 46268-1054 USA

## Granite™ SC EPA Reg. No. 62719-514

(For Distribution and Use Only in the State of California)

### Aerial Application for Selective Postemergence Weed Control in Rice

- 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 Granite™ SC herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
  - Except as described in this supplemental labeling, use of Granite SC is subject to all use precautions and limitations imposed by the label affixed to the product container.

### Directions for Use

Refer to product label for General Use Precautions and Restrictions, Mixing instructions, and all other requirements not covered under this supplemental label.

#### Aerial Buffer Zones

Sensitive Crop	Aerial Buffer Zone Restrictions
Non-target cereal and grass crops such as corn, sugar cane, sudangrass, sorghum, grass grown for seed, millet, and sod farms	50 ft
Cotton	1/4 mile
All other non-target broadleaf, tree and vine crops not listed	2 miles

For aerial applications of Granite SC, the applicator should follow all requirements in the supplemental label and guidelines in the Spray Drift Management, Aerial Application Requirement and Aerial Drift Reduction Advisory sections, in addition to the mandatory aerial buffers, to minimize potential drift to off-target vegetation. In general, the best drift management strategy is to apply the largest droplets that provide sufficient coverage and control.

Where states have more stringent regulations, they must be followed.

#### Spray Drift Management

**Avoiding spray drift is the responsibility of the applicator.** The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator, pest control advisor, and grower are responsible for considering all of these factors when making the decision to apply this product.

**Avoid all direct or indirect contact with non-target plants.** Do not apply near desirable vegetation. Allow adequate distance between target area and desirable plants to minimize exposure.

**Sensitive Areas:** The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

### Endangered Species

If endangered plant species occur in the proximity of the application site, the following mitigation measure is required to avoid adverse effects:

- Leave untreated buffer zones of 85 feet for ground applications or 470 feet for aerial applications.

To determine whether your county has an endangered terrestrial plant species, consult <http://www.epa.gov/espp/usa-map.htm>. Endangered Species Bulletins may also be obtained from extension offices or state pesticide agencies. If the bulletin is not available for your specific area, check with the appropriate local state agency to determine if known populations of terrestrial endangered plants occur in the area to be treated.

### Aerial Application Requirements

**Avoid direct or indirect contact with non-target plants.** Do not apply near desirable vegetation. Allow adequate distance between target area and desirable plants to minimize exposure. The following drift management requirements must be followed to avoid off-target drift movement from aerial applications.

- Apply in a spray volume of 10 gallons or more per acre when applying by air.
- Apply with a minimum wind speed of 3 mph but no greater than 10 mph.
- Apply with medium to coarse droplet size as defined in the ASABE S-572 standard publication entitled "Spray Nozzle Classification by Droplet Spectra." Additional information on droplet guidelines can be obtained from the NAAA, USDA or nozzle manufacturer.
- The distance between the outer most nozzles on the boom must not exceed 70% of the wingspan of fixed wing aircraft or 80% of the helicopter rotor width.
- Spray release height should be at the lowest height consistent with efficient application and safety. Release more than 10 feet above canopy must be avoided.
- Aircraft should be patterned per Operation Safe/PAASS program, or equivalent, for calibration and uniformity to provide adequate coverage.

### Aerial Drift Reduction Advisory

**Information on Droplet Size:** For ASABE S-572 Standard compliance, see nozzle manufacturer catalogs, NAAA booklet, or USDA literature or website <http://apmru.usda.gov/> for nozzle and application conditions. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control with the least amount of driftable spray fines.

**Controlling Droplet Size:** Use of coarser spray per ASABE S-572 rating per USDA or manufacturer's ratings can further reduce drift potential.

- **Volume** - Use high flow rate nozzles that will apply a minimum of 10 gallons per acre.
- **Pressure** - Follow the nozzle manufacturer's recommended pressure recommendations.
- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the air stream produces larger droplets than other orientations and is the recommended practice. The use of deflectors is not recommended.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. Consider using low-drift nozzles such as narrow angle flat fan tips. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

**Boom Length:** Reducing the effective boom length to 70% of the wingspan of fixed-wing aircraft or 80% of the helicopter rotor width may further reduce drift without reducing swath width.

**Application Height:** Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

**Swath Adjustment:** Swath adjustment distance should increase with increasing drift potential (higher wind, height, smaller drops, etc.).

**Wind:** Drift potential is lowest between wind speeds of 3 to 10 mph. Application should be avoided below 3 mph due to variable wind direction and high inversion potential. Application is not allowed when wind speeds exceed 10 mph due to risk of direct drift to sensitive crops. Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift. State and local regulations with regard to minimum and maximum wind speeds during aerial application may be more restrictive.

**Temperature and Humidity:** Avoid spraying during conditions of low humidity and high temperature without added precautions. When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is greatest when conditions are both hot and dry.

**Temperature Inversions:** Applications should not occur into a local, low level temperature inversion because drift potential is high. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog or mist or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

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R308-002

Accepted: \_\_/\_\_/\_\_

Replaces R308-001.