



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

July 9, 2008

Mr. Rafael Herrera
Regulatory Leader
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Mr. Herrera:

RE: YOUR ADMINISTRATIVE LETTER DATED DECEMBER 12, 2007, AMENDED SUPPLEMENTAL LABELING, AMEND AERIAL BUFFER ZONES FOR GRANITE® SC IN CALIFORNIA RICE

Your requested proposed supplemental label amendment to revise the aerial buffer zones for your product, Granite® SC, with EPA Reg. No. 62719-514 has been approved. A stamped copy of the approved supplemental label, for distribution and use in California only, is enclosed for your records.

Please contact Phil Errico at [703-305-6663](tel:703-305-6663)/errico.philip@epa.gov for additional assistance in this matter.

Sincerely,

Joanne I. Miller, PM-23
Herbicide Branch/Registration Division

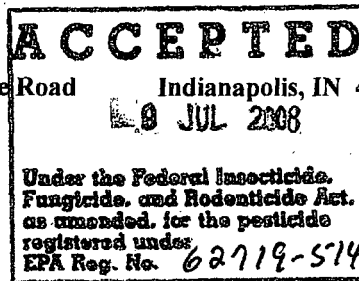
Enclosure: Stamped accepted supplemental label for distribution and use only in California.

Supplemental Labeling



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	
	Flat Fan Nozzles	CP All Other Nozzles
non-target cereal and grass crops such as corn, sugar cane, sudangrass, sorghum, grass grown for seed, millet, and sod farms	50 ft	50 ft
cotton	1/4 mile	1/4 mile
all other non-target broadleaf, tree and vine crops not listed	1 mile (1)	2 miles

1. Flat fan nozzles producing medium to coarse spray must be used.

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 Granite SC using the appropriate nozzle type based upon buffer zone restrictions.
- 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 based upon buffer zone restrictions. ~~Consider using~~ Use low-drift nozzles such as narrow angle flat fan tips. ~~Solid stream n~~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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R308-003

EPA accepted: / /

Replaces R308-002.