

62719-570

LE 3-23-2007

1/25



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Barbara J. Kaminski
Product Registration
Dow AgroScience LLC
9330 Zionsville Road
Indianapolis, IN 46268

MAR 23 2007

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Change of Primary Brand Name to "SureStart herbicide"
EPA Reg. No. 62719-570
Application Dated March 2, 2007

Dea: Ms. Kaminski:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 03/2/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

2/25



United States
Environmental Protection Agency
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Dow AgroSciences/62719-570	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/XDE-PRDX	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

The following change has been made by notification:

- 1. Change of primary brand name from XDE-PRDX to SureStart™ herbicide.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container
		If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Barbara Kaminski	Title Regulatory Manager	Telephone No. (Include Area Code) (317) 337-5424
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature <i>Barbara Kaminski</i>	3. Title Regulatory Manager	
4. Typed Name Barbara Kaminski ™Trademark of Dow AgroSciences LLC	5. Date March 2, 2007	

308/2E
March 2, 2007



Document Processing Desk (**NOTIF**)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

XDE-PRDX (A.I.: ACETOCHLOR, FLUMETSULAM, CLOPYRALID)
EPA REGISTRATION NUMBER: 62719-570
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of XDE-PRDX herbicide. The following changes have been made by notification:

1. Change of primary brand name from XDE-PRDX to SureStart™ herbicide.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Contents of Submission

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled SureStart (Q6H / SureStart / FPL / 03-02-07) (21 Pages plus Registration Notes) (5 Copies)

If you require further information, please contact Amy Hudson, Regulatory Specialist at (317) 337-3967 or Paula McKinnies, Registration Assistant for this product, at (317) 337-4679.

Sincerely,

A handwritten signature in black ink that reads "Amy Hudson Hce".

Barbara J. Kaminski
Regulatory Leader
Regulatory Success – Americas
(317) 337-5424
(317) 337-4649 (FAX)

BJK/akh
Enclosures

Q6H / SureStart / FPL / 03-02-07
file: SureStart-570 02Mar07Nf.doc

4/25

SureStart™

EPA Reg. No. 62719-570

Registration Notes:

Final printed labeling based on EPA accepted label dated March 1, 2007 and Notification dated March 2, 2007.

™ Trademark of Dow AgroSciences LLC

S/25

(Base Label)

RESTRICTED USE PESTICIDE
Due to Oncogenicity
 For retail sale to and use only by Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

SureStart™

Herbicide

For use only on herbicide tolerant field corn and silage corn

Active Ingredients:

acetochlor: 2-chloro-2'-methyl-6'-ethyl-N-ethoxymethylacetanilide	41.67%
flumetsulam: N-(2,6-difluorophenyl)-5-methyl-1,2,4-triazolo-[1,5a]-pyrimidine-2-sulfonamide	1.3%
clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid, monoethanolamine salt	4.27%
Other Ingredients:.....	52.76%
Total.....	100.00%

Acid equivalent: clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid – 3.24% (0.29 lb/gal)

Contains 3.75 lb acetochlor, 0.38 lb clopyralid monoethanolamine salt, and 0.12 lb flumetsulam active ingredient per gallon

Keep Out of Reach of Children

CAUTION PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Moderate Eye Irritation • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals

Avoid contact with eyes or clothing.

Personal Protective Equipment (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category F or G on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride
- Chemical-resistant footwear plus socks
- Protective eyewear

6/25

- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 day or night, for emergency medical treatment information.

Environmental Hazards

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Acetochlor demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the groundwater is shallow, may result in groundwater contamination.

Flumetsulam and clopyralid are known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this product where soils are permeable, particularly where the water table is shallow, may result in leaching to ground water.

Caution should be exercised when handling this product at mixing and loading sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Acetochlor has properties that may result in surface water contamination via dissolved runoff and runoff erosion. Practices should be followed to minimize the potential for dissolved runoff and/or runoff erosion.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

7/25

Refer to label booklet for Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies at end of label booklet. If terms are not acceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-570

EPA Est. _____

™ Trademark of Dow AgroSciences LLC

Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Net Contents _____

8/25

(Label Booklet)

RESTRICTED USE PESTICIDE
Due to Oncogenicity
 For retail sale to and use only by Certified Applicators, or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

SureStart™

Herbicide

For use only on herbicide tolerant field corn and silage corn

Active Ingredients:

acetochlor: 2-chloro-2'-methyl-6'-ethyl-N-ethoxymethylacetanilide	41.67%
flumetsulam: N-(2,6-difluorophenyl)-5-methyl-1,2,4-triazolo-[1,5a]-pyrimidine-2-sulfonamide	1.3%
clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid, monoethanolamine salt	4.27%
Other Ingredients:	52.76%
Total	100.00%

Acid equivalent: clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid – 3.24% (0.29 lb/gal)

Contains 3.75 lb acetochlor, 0.38 lb clopyralid monoethanolamine salt, and 0.12 lb flumetsulam active ingredient per gallon

Keep Out of Reach of Children

CAUTION PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

Agricultural Use Requirements
 Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Refer to label booklet for Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies at end of label booklet. If terms are not acceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-570

EPA Est. _____

™ Trademark of Dow AgroSciences LLC

9/05

Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Net Contents __

10/25

(Page 1 through end):

Table of Contents	Page
Precautionary Statements	-
Hazards to Humans and Domestic Animals	-
Personal Protective Equipment (PPE)	-
Engineering Controls	-
User Safety Recommendations	-
First Aid	-
Environmental Hazards	-
Directions for Use	-
Agricultural Use Requirements	-
Storage and Disposal	-
General Information	-
General Use Precautions and Restrictions	-
Application Precautions	-
Restrictions and Precautions for Soil Application	-
Adverse Weather Conditions	-
Soil Insecticide Advisories	-
Soil Insecticide Advisories for Postemergence Applications	-
Foliar Insecticide Advisories for Postemergence Applications	-
Other Precautions and Restrictions	-
Sprayer Cleanup	-
Rotational Crop Restrictions	-
Application Directions - Corn	-
Carriers and Spray Volume	-
Liquids	-
Dry Bulk Fertilizer	-
Adding To Spray Tank	-
Used Alone	-
Tank Mixed	-
Water Carrier	-
Liquid Fertilizer Carrier	-
Application Timing and Methods	-
Early Preplant	-
Preplant Incorporation	-
Preemergence Surface	-
Postplant-Preemergence	-
Early Postemergence	-
Sprinkler Irrigation	-
Fall Application	-
Cultivation	-
Soil Texture and Organic Matter	-
Use Rates	-
Target Weeds Controlled or Partially Controlled by SureStart at Recommended Use Rates	-
Tank Mix Combinations	-
Use of Spray Adjuvants	-
Appendix I	-
Procedure for Testing the Compatibility of SureStart and Tank	-
Mixes with Fluid Fertilizers	-
Materials Needed	-
Procedure	-
Evaluation	-
Appendix II	-
Dry Bulk Fertilizer Impregnation	-

11/25

Approved Dry Fertilizer Ingredients for Use with SureStart
Terms and Conditions of Use
Warranty Disclaimer
Inherent Risks of Use
Limitation of Remedies

-
-
-
-

12/25

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

Causes Moderate Eye Irritation • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals

Avoid contact with eyes or clothing.

Personal Protective Equipment (PPE)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category F or G on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical-resistant apron when cleaning equipment, mixing, or loading

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 day or night, for emergency medical treatment information.

13/95

Environmental Hazards

This product is toxic to fish. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Acetochlor demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the groundwater is shallow, may result in groundwater contamination.

Flumetsulam and clopyralid are known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this product where soils are permeable, particularly where the water table is shallow, may result in leaching to ground water.

Caution should be exercised when handling this product at mixing and loading sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Acetochlor has properties that may result in surface water contamination via dissolved runoff and runoff erosion. Practices should be followed to minimize the potential for dissolved runoff and/or runoff erosion.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls over short-sleeved shirt and short pants
- Chemical-resistant gloves made of any waterproof material
- Chemical-resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure

14/25

Storage and Disposal

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

Pesticide Storage: Store in original container only. Keep container closed when not in use. Do not store near food or feed. In case of spill or leak on floor or paved surfaces, soak up with vermiculite, earth, or synthetic absorbent. Mix product thoroughly before using.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Disposal: Triple rinse (or equivalent); then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

For Bulk and Mini-Bulk Containers

Container Disposal: Triple rinse (or equivalent); then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

Container Precautions: Before refilling, inspect thoroughly for damage such as cracks, punctures, bulges, dents, abrasions, and damaged or worn threads on closure devices.

For Mini-Bulk Containers: Refill Only With SureStart. The contents of this container cannot be completely removed by cleaning. Refilling with materials other than SureStart will result in contamination and may weaken container.

- After filling and before transporting, check for leaks.
- Do not refill or transport damaged or leaking container.
- Circulation before dispensing is required.

General Information

SureStart™ herbicide is for use only on herbicide tolerant field corn and silage corn. This product is limited to applications in herbicide tolerant corn, such as Roundup Ready® or Liberty Link® field and silage corn. It may be used in preplant, preemergence, or early postemergence applications in corn. It is designed to provide early season control of grass and broadleaf weeds to allow for optimal timing of the in-crop postemergence application of glyphosate or glufosinate.

SureStart is a unique combination of the herbicides acetochlor, flumetsulam, clopyralid, and the safener dichlormid. SureStart may be applied to the surface or incorporated into the top 1 to 2 inch layer of soil. It is recommended for use alone or in tank mix combinations for control or suppression of weeds, as indicated in the Target Weeds section of these use directions. SureStart controls weeds by interfering with normal germination and seedling development. SureStart may provide postemergence activity on 1 to 2 inch broadleaf weeds present at application but will not provide postemergence activity on grass weeds present at application. If emerged grass and broadleaf weeds are present at the time of application, best results will be achieved by tank mixing a herbicide such as glyphosate (Durango® or Roundup®), glufosinate (Liberty®) or paraquat (Gramoxone) and, or 2,4-D with SureStart.

General Use Precautions and Restrictions

- Do not apply to the following soils if groundwater depth is 30 feet or less:
 - sand with less than 3% organic matter
 - loamy sand with less than 2% organic matter
 - sandy loam with less than 1% organic matter.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- Do not use flood irrigation to apply or incorporate this product.
- **Do not apply this product using aerial application equipment.**

- This product may not be mixed or loaded within 50 feet of any wells including abandoned wells and drainage wells, sink holes, perennial or intermittent streams and rivers, and natural or impounded lakes and reservoirs. This setback does not apply to properly capped or plugged abandoned wells and does not apply to impervious pad or properly diked mixing/loading areas.
- Operations that involve mixing, loading, rinsing, or washing of this product into or from pesticide handling or application equipment or containers within 50 feet of any well are prohibited unless conducted on an impervious pad constructed to withstand the weight of the heaviest load that may be positioned on or moved across the pad. Such a pad shall be designed and maintained to contain any product spills or equipment leaks, container or equipment rinse or washwater, and rainwater that may fall on the pad. Surface water shall not be allowed to either flow over or from the pad, which means the pad must be self-contained. The pad shall be sloped to facilitate material removal. An unroofed pad shall be of sufficient capacity to contain at a minimum 110% of the capacity of the largest pesticide container or application equipment on the pad. A pad that is covered by a roof of sufficient size to completely exclude precipitation from contact with the pad shall have a minimum containment capacity of 100% of the capacity of the largest pesticide container or application equipment on the pad. Containment capacities as described above shall be maintained at all times. The above specified minimum containment capacities do not apply to vehicles when delivering pesticide shipments to the mixing/loading site. States may have in effect additional requirements regarding wellhead setbacks and operational containment.
- Product must be used in a manner that will prevent back siphoning in wells, spills or improper disposal of excess pesticide, spray mixtures or rinsates.
- **Read and follow these Advisories to minimize drift to non-target areas.**
- Minimize drift by using sufficient spray volume to ensure adequate coverage with large-droplet size sprays.
 - Use low pressure application equipment capable of producing a large-droplet spray. Do not use nozzles that produce a fine-droplet spray. Droplet size has been shown to be the single most important factor affecting drift from ground applications.
 - While increasing droplet size does reduce the potential for spray drift, larger droplets do not eliminate drift if environmental or application conditions are inappropriate for application.
 - Use larger capacity nozzles to increase flow rate rather than increasing spray pressure.
 - Keep height of ground-driven spray booms as low as possible above the target to minimize exposure to evaporation and wind while still providing good coverage. Applications made late in the growing season with excessive boom heights drastically increase the potential for spray drift.
 - Make application when the wind velocity favors on-target product deposition (approximately 3 to 10 mph).
 - Do not apply when wind is gusting or wind speed exceeds 15 mph as uneven spray coverage and drift may result. Avoid application to border rows adjacent to susceptible crops such as soybeans, field peas, or sunflowers under windy conditions unless one of the following drift management steps is taken:
 - application is made only when the wind direction is such that the susceptible crop is up-wind from the treatment area (wind blowing from the susceptible crop toward the treated crop); or
 - the applicator leaves an adequate buffer zone between the treated crop and the susceptible crop and coarse or low drift nozzle configurations are used.
 - A drift control or deposition agent may be used with this product to aid in reducing spray drift due to wind when making applications adjacent to susceptible crops, but may not be effective after prolonged pumping of the spray mix.
 - On calm days with little or no wind, check for temperature inversions before making herbicide applications. Temperature inversions occur under calm conditions with little or no wind and air temperature increases with increasing height above the ground. Inversion conditions may be indicated by a layer of fog or mist near the ground and, under clear conditions, may be detected by use of a smoke column. A temperature inversion is indicated when smoke does not rise in a column, but layers at some level above the ground. Do not apply herbicides if temperature inversion conditions exist in the treatment area.
- Do not apply under conditions that favor runoff or wind erosion of soil containing this product to non-target areas. To prevent off-site movement due to runoff or wind erosion:

16/25

- Avoid treating powdery dry or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface must first be settled by rainfall or irrigation.
- Do not apply to impervious substrates such as paved or highly compacted surfaces or frozen or snow covered soils.
- Do not use tailwater from the first flood or furrow irrigation of treated fields to treat non-target crops unless at least 1/2 inch of rainfall has occurred between application and the first irrigation.

Application Precautions

- Uneven application or uneven incorporation of SureStart can result in erratic weed control or crop injury. Over application may result in crop injury or rotational crop damage from soil residue.
- **Maximum Application:** The total cumulative maximum application amount of SureStart on corn is 3.5 pints per acre per crop season.
- Do not exceed 2 pints per acre in a single application.

Restrictions And Precautions For Soil Application (Not Applicable To Postemergence Use)

- **Corn Planting Depth:** Minimum planting depth should be at least 1 ½ inches.
- Do not apply to areas where the soil pH is greater than 7.8 as this may result in increased crop injury.
- Do not apply to a soil containing greater than 5% organic matter if the soil pH is below 5.9 as reduced weed control will result.
- Use of SureStart in soil-applied treatments on soils with less than 1.5% organic matter (O.M.) may result in crop injury. Apply as a soil-treatment to fields which have less than 1.5% O.M. only if the risk of crop injury is acceptable.
- If any herbicide with ALS (acetolactate synthase) inhibition mode of action such as Pursuit, Canopy, Classic, Scepter, or Squadron herbicide, etc., was applied the previous year, apply SureStart to corn only if the rotational restrictions applicable to corn for the preceding product has been met.

Adverse Weather Conditions

- Extended cold, wet conditions (soil temperatures below 50°F and excessive rainfall with wet soil conditions), following application of SureStart to herbicide tolerant corn, which persist during germination and/or early crop development may result in crop injury. Injury symptoms, which include yellowing of leaves and/or crop stunting, are usually temporary and affected corn plants usually recover without affecting yield.
- Dry weather following preplant surface or preemergence applications of SureStart may reduce effectiveness. If sufficient activating rainfall or overhead irrigation does not occur within 7 to 10 days of application, rotary hoe, harrow, or shallowly cultivate to incorporate the herbicide lightly into the soil. Use a preplant incorporated application when a period of dry weather is predicted after application.
- Low humidity and high temperatures increase the likelihood of spray drift to sensitive areas. Avoid spraying during conditions of low humidity and/or high temperatures. Do not apply during inversion conditions.

Soil Insecticide Advisories

When SureStart is used for soil applied broadleaf weed control in corn:

- Soil applied organophosphate insecticides should be applied in a T-band or a band to avoid potential crop injury.
- Soil insecticides from other classes of chemistry may be applied in-furrow, T-banded, or banded.
- Terbufos (Counter insecticide products) or phorate (Thimet insecticide products) should not be used.

Soil Insecticide Advisories for Postemergence Applications

- Do not apply SureStart postemergence if corn was previously treated with Counter insecticide or Thimet insecticide as severe crop injury may result.
- Postemergence applications of SureStart to corn previously treated with T-band, band, or in-furrow applications of other organophosphate insecticides such as Lorsban* insecticide, Aztec or Fortress, insecticides may cause temporary crop injury.

17/25

Foliar Insecticide Advisories for Postemergence Applications

- Do not tank mix SureStart with foliar postemergence organophosphate insecticides as severe crop injury may result. To avoid crop injury, apply the foliar organophosphate insecticide treatment at least 10 days before or 10 days after the application of SureStart.
- SureStart may be tank mixed with non-organophosphate foliar insecticides provided they are labeled for use with postemergence corn herbicides.

Other Precautions and Restrictions

- Do not apply SureStart to sweet corn or popcorn.
- **Hybrid Seed Production:** Corn inbred lines grown for hybrid seed production may be injured by SureStart. Inbred lines should be thoroughly tested for crop tolerance before treating large acreage. While growers are not prohibited from using SureStart on seed corn, **Dow AgroSciences will not accept responsibility for any crop injury arising from the use of SureStart on field corn grown for seed.**
- **Preharvest interval:** An interval of at least 85 days is required between application of SureStart and field corn harvested for grain.
- **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 under conditions of application to minimize potential exposure.
- **Crop Residues from Treated Areas:** Crop residues from treated areas cannot be used for composting or mulching on ground where susceptible crops may be grown the following season. To promote herbicide decomposition, plant material should be evenly incorporated or burned. Adequate moisture is also required to promote breakdown of plant residues, which contain clopyralid.
- **Do not move treated soil.** Avoid situations where soil particles may blow into areas where susceptible crops are grown. The hazard of movement of this product on dust is reduced if treated fields are irrigated or if rain occurs shortly after application.
- **Do not apply under conditions that favor runoff or wind erosion of soil containing SureStart to non-target areas. To prevent off-site movement due to runoff or wind erosion:**
- Avoid treating powdery dry or light sandy soils when conditions are favorable for wind erosion. Under these conditions, the soil surface should first be settled by rainfall or irrigation.
- Do not apply to impervious substrates such as paved or highly compacted surfaces or frozen or snow covered ground.
- Do not apply to soils when saturated with water.
- **Do not apply when weather conditions favor drift to non-target sites.** Spray drift of SureStart to emerged soybeans or soil to which soybeans will be planted during the same growing season may cause soybean injury.

Sprayer Cleanup

To avoid injury to or exposure of non-target crops, thoroughly clean and drain spray equipment used to apply SureStart after use. Cleaning should occur as soon as possible after application of SureStart. Spray equipment should be cleaned after use with SureStart by the following procedure:

1. Drain any remaining SureStart from the spray tank and dispose of according to label disposal instructions.
2. Hose down the interior surfaces of the tank. Flush tank, hoses, boom, and nozzles with clean water for 10 minutes. Fill the tank with water and recirculate for 15 minutes. Spray part of the mixture through the hoses, boom, and nozzles and drain the tank. All rinse water must be disposed of in compliance with local, state, and federal guidelines.
3. Fill the tank with water and recirculate for 15 minutes. For optimum cleaning, a tank cleaner such as liquid ammonia (1 gallon per 100 gallons of water) or other commercial tank cleaner is recommended in the second rinse if the spray equipment will be used on crops other than field corn. Spray part of the mixture through the hoses, boom, and nozzles and drain the tank. All rinse water must be disposed of in compliance with local, state, and federal guidelines.
4. Remove the nozzles and screens and clean separately.

18/25

- If the spray equipment will be used on crops other than field corn, repeat steps 1 and 2 again and thoroughly wash the spray mixture from the outside of spray tank and the boom.

Rotational Crop Restrictions:

When tank mixing with other herbicides, follow the most restrictive crop rotation guidelines on the label of each product used. The following rotational crops may be planted as indicated:

Rotational Crop (1)	Timing or Interval
corn	0 months after application
wheat	4 months after application
soybeans, sorghum	Spring following application
tobacco	18 months

Numbers within parentheses (-) in the table refer to Specific Rotational Crop Requirements below.

- If crop treated with SureStart is lost, corn may be replanted immediately. Do not rotate to crops other than corn, soybeans, sorghum, tobacco and wheat.

Application Directions - Corn

Carriers and Spray Volume

Liquids: Either water or liquid fertilizers such as solutions, slurries, or suspensions may be used as liquid carriers. If fluid fertilizers are used, a physical compatibility with these must be done **before combining** in the spray tank. See Appendix I for details of the compatibility testing procedure. Even if SureStart is physically compatible with a fluid fertilizer, constant agitation is necessary to maintain a uniform mixture during application.

Apply in a minimum broadcast spray volume of 10 gallons per acre using boom equipment for ground applications. Use low pressure nozzles designed for application of herbicides. Use sufficient operating pressure to produce the desired spray pattern for the nozzle (15 to 40 psi) and follow manufacturer's recommendations for nozzle spacing and operating height to ensure uniform spray distribution at the soil surface. Use 50-mesh or coarser screens, if needed.

Dry Bulk Fertilizer: SureStart may be impregnated on dry bulk fertilizer and applied as the fertilizer is spread. Use at least 200 lb of dry bulk fertilizer per acre. See Appendix II for more details including which fertilizers are compatible.

Adding to Spray Tank

The spray tank must be clean, thoroughly rinsed, and decontaminated before adding either SureStart alone or in tank mix combinations. If water is used as the carrier, use clean water. All return lines to the spray tank must discharge below the liquid level.

Used Alone: If SureStart is used alone, add the recommended amount to the spray tank before the tank is half filled, then add the rest of the water or fluid fertilizer. Provide sufficient agitation to ensure thorough mixing and to maintain a uniform spray mixture during application.

Tank Mixed: If a tank mixture is used, it is recommended that a small-scale test of compatibility be done before actual tank mixing. See Appendix I for details on the procedure for such a test.

Water Carrier

Allow time for complete dispersion/mixing before adding another product to the spray mixture. Add products to the tank mixture in the following order:

19/25

- Compatibility agent if needed
- To start, add one-half of the required amount of water to the spray tank. Begin agitation.
- Products in water soluble packaging. Important: Allow time for complete dispersion.
- Wettable powders or dry flowables (slurry if recommended by tank mix product label)
- Liquid flowables
- SureStart or other emulsifiable concentrates
- Suspension concentrates
- Urea ammonium nitrate (UAN) or ammonium sulphate (AMS), if required
- Soluble liquids such as glyphosate, paraquat, 2,4-D amine
- Crop oil concentrate (COC) or nonionic surfactant (NIS), if required
- Finish filling spray tank to required spray volume

Liquid Fertilizer Carrier

Allow time for complete dispersion/mixing before adding another product to the spray mixture. Add products to the tank mixture in the following order:

- To start, add one-half of the required amount of liquid fertilizer to the spray tank. Begin agitation.
- Compatibility agent if needed
- Products in water soluble packaging. Important: Products in water soluble packaging must be premixed with water (slurried) prior to addition to the spray tank.
- Wettable powders or dry flowables (slurry if recommended by tank mix product label)
- Liquid flowables
- SureStart or other emulsifiable concentrates
- Suspension concentrates
- Ammonium sulphate (AMS), if tank mixing with glyphosate.
- Soluble liquids such as glyphosate, paraquat, 2,4-D amine
- Crop oil concentrate (COC) or nonionic surfactant (NIS), if required
- Finish filling spray tank to required spray volume.

Note: For all tank mixtures, maintain agitation during mixing and throughout application to ensure spray mixture remains uniformly suspended.

Application Timing and Methods

For the optimum period of effective weed control during the time most critical to corn production, preplant and preemergence applications of SureStart herbicide should occur as close as possible to planting, prior to weed emergence. Postemergence applications may be made from prior to weed emergence up to 1 to 2 inch weeds. If weeds are emerged, apply in tank mix combination with a glyphosate product such as, Durango or Roundup or a glufosinate product such as, Liberty to control emerged weeds in herbicide tolerant corn.

Early Preplant: SureStart and certain tank mixtures may be applied as early as 30 days before planting.

Preplant Incorporation: SureStart and certain tank mixes may be mechanically incorporated into the top 2 inches of the soil by mechanical means such as field cultivators, discs, or spring tooth harrows any time up to 14 days before planting. Improper incorporation, excessive crop residues, or poor soil tilth may result in erratic, streaked, or otherwise unsatisfactory weed control. Do not mix SureStart deeper than 2 inches into the soil and avoid moving or shaping soil after incorporation.

Preemergence Surface: SureStart and certain tank mixes may be applied to the soil surface as a broadcast or banded application. Precipitation or sprinkler irrigation of at least 0.25 inch is required to bring SureStart into contact with germinating seeds. If rain or sprinkler irrigation does not occur within 7 days after application, weed control may be improved by using a rotary hoe or similar equipment to incorporate the herbicide. Incorporation equipment should be run at a shallow depth to avoid disturbance of germinating corn seed. Erratic weed control resulting from exposure of untreated soil may occur if surface soil is moved or reshaped after incorporation.

20/25

Postplant-Preemergence: SureStart may be applied after planting but prior to corn emergence. If rain or sprinkler irrigation does not occur within 7 days after application, weed control may be improved by using a rotary hoe or similar equipment to shallowly incorporate the herbicide. Incorporation equipment should be run at a shallow depth to prevent disturbance of the germinating corn. Erratic weed control resulting from exposure of untreated soil may occur if surface soil is moved or reshaped during incorporation.

Early Postemergence: SureStart may be applied early postemergence to corn up to 11 inch tall corn. Applications may be made from prior to weed emergence up to 1 to 2 inch weeds. If weeds are emerged, apply in tank mix combination with a glyphosate product such as Durango or Roundup or a glufosinate product such as Liberty to control emerged weeds in herbicide tolerant corn. Read and follow restrictions and directions on tank mix product labels. SureStart will provide limited activity on small (1-2 inch) emerged broadleaf weeds but will not control established or germinated grass weeds present at application listed in the Target Weeds Controlled or Partially Controlled section of this label. If grass and broadleaf weeds have germinated, and emerged, best results will be achieved by tank mixing a glyphosate herbicide (Durango or Roundup) or glufosinate herbicide (Liberty) with SureStart for control of emerged weeds. SureStart will provide soil residual control of the grass and broadleaf weeds listed in the Target Weeds Controlled or Partially Controlled section of this label. **Note: Postemergence applications of SureStart tank mixed with glyphosate may be applied only on corn varieties designated as containing the Roundup Ready gene. Postemergence applications of SureStart tank mixed with glufosinate may be applied only on corn varieties designated as containing the Liberty Link gene.**

Sprinkler Irrigation: Do not apply SureStart by sprinkler irrigation. Use a sprinkler system only to incorporate SureStart after application. After SureStart has been applied, a sprinkler irrigation system set to deliver 0.25 to 0.75 inch of water per acre may be used to incorporate the product. Using more than 0.75 inch of water could result in reduced performance. On sandy soil low in organic matter, use no more than 0.5 inch of water. Do not use flood irrigation to apply or incorporate SureStart.

Fall Application: Following soybean harvest, apply to soybean stubble after October 15, when the sustained soil temperature at 4-inch depth is less than 50°F, but before ground freezes. Use on medium and fine textured soils with greater than 2.5% organic matter. Only corn may be planted the following spring.

Ground may be tilled before or after application. Do not exceed 2-inch incorporation depth if tilled after application.

If a spring application is made, the total rate of the fall plus spring application must not exceed the maximum labeled rate for corn grown on that soil.

Cultivation

Cultivation should be delayed as long as possible. If weeds develop, a shallow cultivation or rotary hoeing will generally result in improved weed control. If SureStart was incorporated, cultivate to a depth of less than half the depth of incorporation.

If cultivation is necessary due to soil crusting or compaction, adjust equipment to run shallow and minimize soil movement. This will decrease the possibility of diluting or moving the herbicide from the weed control zone.

Soil Texture and Organic Matter

The use rate of SureStart is determined by a combination of two factors, soil texture and organic matter, which must be determined prior to application. Different soil textures are grouped into three textural classes (coarse, medium, and fine) as outlined in Table 1. Soil texture and organic matter content of the soil may be determined from soil survey information and/or by laboratory analysis and must be known in order to select the proper rate from Table 2.

21/25

Table 1: Soil Texture Groupings for SureStart Use Rate Selection.

Coarse	Medium	Fine
Sand Loamy Sand Sandy Loam	Loam Silt Silt Loam Sandy Clay Loam	Silty Clay Loam Silty Clay Sandy Clay Sandy Clay Loam Clay Loam Clay

Use Rates

SureStart may be used in conventional, reduced and no-till systems. Optimal weed control will be obtained when applications are made as close as possible to planting but before weeds emerge. However, applications may be made from 30 days prior to planting through 11 inch tall corn. In reduced or no-till systems, it is recommended that a burndown herbicide such as glyphosate (Durango, Roundup or Touchdown), glufosinate (Liberty) or paraquat (Gramoxone) and, or 2,4-D be tank mixed with SureStart if emerged weeds are present at application.

Use Rates for SureStart by Soil Texture and Organic Matter Content

Soil Texture	Soil Organic Matter Content	
	Less Than 3%	3% or Greater
	Pints/Acre	Pints/Acre
Coarse	1.5	1.5
Medium	1.5 – 1.75	1.75
Fine	2.0	2.0

Target Weeds Controlled or Partially Controlled by SureStart at Recommended Use Rates.

SureStart will provide activity on the following weeds which will allow for optimal timing of an in-crop postemergence application of glyphosate or glufosinate in herbicide tolerant corn. Partially controlled weeds will be severely stunted, or experience reduced height, vigor, or population compared to untreated areas.

Grasses and Sedges	Broadleaves	
barnyardgrass	amaranth, Palmer	ragweed, common
crabgrass spp.	beggarweed, Florida	ragweed, giant
crowfootgrass	buckwheat, wild	shepherd's purse
cupgrass, prairie	carpetweed	sicklepod
cupgrass, southwestern	chickweed, common	sida, prickly
cupgrass, woolly	clover, red	smartweed, Pennsylvania
foxtail, bristly	cocklebur, common	spurge, nodding
foxtail, giant	galinsoga	spurge, prostrate
foxtail, green	henbit	spurge, spotted
foxtail, robust (purple, white)	horseweed (maretail)	sunflower, common
foxtail, yellow	jimsonweed	thistle, Canada (1)
goosegrass	kochia	velvetleaf
johnsongrass, seedling	ladysthumb	waterhemp species

millet, foxtail	lambsquarters, common	wormwood, biennial
millet, wild proso	mallow, Venice	
nutsedge, yellow	morningglory, ivyleaf	
panicum, browntop	morningglory, tall	
panicum, fall	mustard, wild	
panicum, Texas	nightshade species	
rice, red	pigweed, redroot	
sandbur, field	pigweed, smooth	
shattercane	poinsettia, wild	
signalgrass, broadleaf	puncturevine	
sprangletop, red	purslane, common	
witchgrass	pusley, Florida	

(1) Burndown activity of Canada thistle in minimum and no-till corn only.

SureStart will provide limited activity on small (1-2 inch) emerged broadleaf weeds but will not control established or germinated grass weeds present at application. If grass and broadleaf weeds have germinated, and emerged, best results will be achieved by tank mixing a glyphosate herbicide (Durango, Roundup or Touchdown) or glufosinate herbicide (Liberty) with SureStart for control of emerged weeds. SureStart will provide soil residual control of the grass and broadleaf weeds listed above.

SureStart will control or suppress glyphosate, triazine or ALS resistant biotypes of the weeds listed above.

Tank Mix Combinations

Additional weeds may be controlled with tank mixes. Tank mix combinations may be used in either conventional, reduced, or no-till systems and may be applied by the same methods and at the same application timing as SureStart herbicide unless otherwise specified in the tank mix product label.

If emerged grass and broadleaf weeds are present at the time of application, best results will be achieved by tank mixing the appropriate rate of herbicides such as glyphosate (Durango, Roundup or Touchdown) or paraquat (Gramoxone) and, or 2, 4-D with SureStart. **Do not** post apply SureStart in tank mix combination with Basagran, Laddock or Lightning herbicides as severe crop injury may result.

SureStart may be tank mixed with any other herbicide labeled for use on corn provided the compatibility of the tank mix is verified by a jar test and tank mixing with SureStart is not prohibited by the label of the tank mix product. The compatibility of a tank mixture can be determined by mixing the ingredients of the herbicide mixture in their relative proportions in a glass jar as described for fluid fertilizer mixtures in Appendix I by substituting water for fluid fertilizer. Refer to the label of the tank mix product for applicable use directions, precautions and limitations, including additional weeds controlled. Do not exceed application rates on the respective product labels. Do not tank mix with another pesticide product that contains the same active ingredient as this product unless the label of either tank mix partner specifies the maximum dosages that may be used.

Use of Spray Adjuvants

SureStart is a preemergence herbicide for which spray adjuvants have little or no influence on performance. However, several herbicides used in tank mixtures with SureStart require use of adjuvants to aid in the control of emerged weeds. Use only those adjuvants recommended on the label of the tank mix product and approved for use in growing crops. Surfactants and/or low rate liquid fertilizers (28%, 30% or 32% UAN) or ammonium sulfate (AMS) adjuvants may be used with tank mixes applied preplant or preemergence to the crop.

Appendix I

Procedure for Testing the Compatibility of SureStart and Tank Mixes with Fluid Fertilizers

Since fluid fertilizers vary, the following procedure is suggested for determining whether SureStart herbicide may be combined with a specific fluid fertilizer for spray tank application.

Materials Needed:

1. SureStart and any tank mix products
2. Fluid fertilizer to be used
3. Adjuvant for fertilizer tank mix: Use any adjuvant cleared for use on growing crops under 40 CFR 180.1001 to improve the compatibility of SureStart with fluid fertilizers. The adjuvant that provides the best emulsification depends upon the specific fertilizer under consideration.
4. Two 1 quart, wide mouth glass jars with lid or stopper
5. Measuring spoons (a 25 ml pipette or graduated cylinder provides more accurate measurement)
6. Measuring cup, 8 oz (257 ml)

Procedure:

1. Pour a pint (about 473 ml) of the fluid fertilizer into each of the quart jars.
2. Add SureStart and any tank mix combination to the jars. The order of addition is wettable powders first with mixing, followed by flowables with mixing and the ECs last. The rate of wettable powders and dry flowables is 1 1/2 teaspoon per pound of product per acre to be applied. ECs should be added at the rate of 1/2 teaspoon for each pint per acre to be applied. Premixing the wettable powders in 1 oz of water before adding to the pint of fluid fertilizer will improve the compatibility of the final mixture.
3. Add 1/2 teaspoon (2 ml) adjuvant to one of the jars, label it as "with," and mix. The rate of 1/2 teaspoon per pint is equal to 3 pints of adjuvant per 100 gallons of fluid fertilizer.
4. Close both jars with lids or stoppers and mix the contents by turning the jars upside down 10 times.
5. Inspect the surface and body of the mixtures-
6. Immediately after completing the jar inversions
7. After allowing the jars to stand undisturbed for 30 minutes
8. And then again after turning the jars upside down 10 times after the 30 minute inspection

Evaluation:

If either mixture remains uniform for 30 minutes, the combination may be used. Should either mixture separate after 30 minutes, but readily remix uniformly with 10 jar inversions, the mixture can be used if adequate agitation is maintained in the tank. If the mixture with adjuvant is satisfactory but the one without adjuvant is not, be sure to use the adjuvant in the spray tank. Add the adjuvant first at a rate of 3 pints per 100 gallons of fluid fertilizer. Foaming may be minimized by using moderate agitation. **If non-dispersible oil, sludge, or clumps of solids form in the mixtures, the combination should not be used.**

Appendix II

Dry Bulk Fertilizer Impregnation

All individual state regulations relating to dry bulk fertilizer blending, registration, labeling, and application are the responsibility of the individual and/or company selling SureStart fertilizer mixtures.

When applying SureStart alone or in tank mixes with dry bulk fertilizers, follow all directions for use and precautions on the respective tank mix product labels regarding use rates, soil texture, application methods, and rotational restrictions. Use a minimum of 200 lb of dry bulk fertilizer per acre.

Approved Dry Fertilizer Ingredients for Use with SureStart¹

24/25

Fertilizer	N	P	K
Ammonium Phosphate-Sulfate	16	20	0
Ammonium Sulfate	21	0	0
Diammonium Phosphate	18	46	0
Monoammonium Phosphate	11	56	0
Potassium Chloride	0	0	60
Potassium Sulfate	0	0	52
Urea ²	45	0	0

¹ Do not impregnate on fertilizers containing ammonium nitrate, potassium nitrate, or sodium nitrate.

² Some ureas may be phytotoxic when high rates are applied to corn. Use only urea rates known to be safe for corn application.

For impregnating pesticides on dry fertilizers, use suitable mixers equipped with suitable spraying equipment. The spray nozzles should be positioned inside the mixer to provide uniform spray coverage of the tumbling fertilizer. SureStart should be sprayed uniformly onto the fertilizer using a fine spray pattern. Tank mix components may be applied as separate ingredients with powders and dry flowables added first or they may be mixed in a slurry in the proper ratio and added jointly. SureStart may also be impregnated on dry bulk fertilizer in the field while the fertilizer is being spread using a pneumatic applicator equipped to impregnate herbicides.

The following table provides a reference to determine the amount of SureStart to be mixed per ton of dry bulk fertilizer for a range of herbicide rates.

Fertilizer Rate (lb/acre)	Acres Covered (per ton)	SureStart (pints/acre)		
		2 pt/acre	2.5 pt/acre	3 pt/acre
Pints Herbicide/Ton Fertilizer				
200	10	20	25	30
300	6.7	13.4	16.8	20.1
400	5	10	12.5	15
500	4	8	10	12
600	3.3	6.6	8.3	9.9
700	2.9	5.8	7.3	8.7

To determine the amount of SureStart needed for other rates of fertilizer, use this formula:

$$\frac{\text{SureStart (pints/acre)}}{\text{Pounds of fertilizer/acre}} \times 2000 = \frac{\text{Pints of SureStart}}{\text{per ton of fertilizer}}$$

If the herbicide/fertilizer mixture is too wet, use of a drying agent is required to provide a dry, free-flowing mixture. For mixtures to be used in spinning-disc applicators, Micro-Cel E calcium silicate powder (Manville, Filtration & Minerals) is recommended for use as a drying agent. Mixtures to be used in pneumatic applicators should use Micro-Cel E or Agsorb 16/30 RVM-MS granular clay (Oil-Dri Corporation). The drying agents should be added separately and uniformly to the prepared pesticide/fertilizer mixture, in a quantity that is sufficient to provide a suitable free-flowing mixture. Generally, less than 2% Micro-Cel E or 5% Agsorb 16/30 RVM-MS by weight is required.

Precaution: To avoid potential for explosion, do not impregnate SureStart on ammonium sorbate nitrate, potassium nitrate, or sodium nitrate fertilizer or fertilizer blends. Do not impregnate on a single (0-20-0) or triple (0-46-0) super phosphate. Do not attempt to impregnate SureStart on agricultural limestone as the herbicide will not be adequately absorbed.

25/25

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. To the extent permitted by law, otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies.

Warranty Disclaimer

Dow AgroSciences warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent permitted by law, Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Crop injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Dow AgroSciences or the seller. To the extent permitted by law, all such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Dow AgroSciences' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent permitted by law, Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. To the extent permitted by law, in no case shall Dow AgroSciences be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

®Trademark of Dow AgroSciences LLC

Roundup Ready® and Roundup® are registered trademarks of Monsanto Technology LLC

Liberty® and Liberty Link® are registered trademark of the Bayer Group

EPA accepted 03-01-07