

62719-570

11-20-2008

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Barbara Kaminski  
Regulatory Manager  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

NOV 20 2008

**SUBJECT:** Application for Pesticide Notification – Supplemental Label Change to Use  
Directions for Rotational Crop Restrictions after Final Application Taken from  
September 19, 2007 Main Label

SureStart™  
EPA Reg. No. 62719-570  
Application Dated October 30, 2007

Dear Ms. Kaminski:

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

If you have any questions, please contact me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

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

	United States <b>Environmental Protection Agency</b> Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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**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/SureStart™	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"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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NOTIFICATION  
NOV 20 2008

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

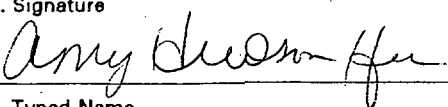
The following change has been made by notification:

- The use directions for Rotational Crop Restrictions After Final Application are taken from the EPA accepted copy of the main label dated September 19, 2007.

**Section - III**

<b>1. Material This Product Will Be Packaged In:</b>			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt.    No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt    No. per container	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			
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 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
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 both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager	(Stamp area)
4. Typed Name Barbara Kaminski <small>™ Trademark of Dow AgroSciences LLC</small>	5. Date October 30, 2007	

308/2E  
October 30, 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

**NOTIFICATION**

**NOV 20 2008**

SURESTART (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 SureStart™ herbicide based on EPA-accepted labeling dated September 19, 2007. The following changes have been made by notification:

1. The use directions for Rotational Crop Restrictions After Final Application are taken from the EPA accepted copy of the main label dated September 19, 2007.

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**

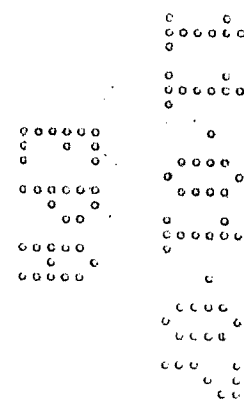
- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled SureStart (Q6H / SureStart / Sec 3 Suppl Rotation Crop / Notif / 10-30-07)  
(2 Page plus Registration Notes) (5 Copies)

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,

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

BJK/akh  
Enclosures



NOV 20 2008

# Supplemental Labeling



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

## SureStart™ EPA Reg. No. 62719-570

### Rotational Crop Restrictions After Final Application

#### ATTENTION

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

#### Directions for Use

Refer to product label for General Use Precautions, Mixing and Application instructions.

#### 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	Anytime - 0 months after application
wheat	4 months after application
alfalfa (2), barley, clover (2), dry beans (2, 3), lespedeza (2), oats, pea (4), popcorn, rye, soybean (2), vetch (2), wild rice	Spring Following Application
sorghum	12 months
potatoes, sunflower, sweet corn (5), tobacco	18 months
sugar beets, canola	26 months (6)

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

- (1) If crop treated with SureStart is lost, corn may be replanted immediately. Do not make a second application of SureStart.
- (2) When annual rainfall and/or irrigation is less than 15 inches on soils with less than 2% organic matter, this crop should not be planted until 18 months after treatment.
- (3) Dry beans includes: adzuki, kidney, lima (dry), navy, pinto
- (4) Pea includes: blackeyed, chick, cow, Crowder, field, pigeon, Southern.
- (5) Certain sweet corn varieties may be planted 10.5 months following application. Please refer to the separate product bulletin for a list of these varieties.
- (6) Rotation to sugar beets and canola requires a 26 – month rotation interval and a successful field bioassay.

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**Field Bioassay Instructions:** In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample field conditions such as soil texture, soil pH, drainage, and any other variable that could affect the seed bed of the new crop. Field bioassay at any time between harvest of the treated crop and the planting of the rotational crop. Observe the test crop for herbicidal activity, such as poor stand (effect on seed germination) chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the test rotational crop; plant only a labeled crop or crop listed in the table above for which the rotational interval has clearly been met.

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R348-002  
EPA Accepted: 09/19/07  
Initial printing.

