62719-570

2012



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON D C 20460

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Jim Baxter Dow AgroSciences LLC 9330 Zionsville Rd Indianapolis IN 46268 1054

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AUG 0 2 2012

Subject SureStart Herbicide EPA Registration Number 62719 570 Submission dated July 25 2012 Incorporation of Supplemental Labels to Master Label

Dear Mr Baxter

The labeling referred to above submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act as amended is acceptable Submit one (1) copy of final printed labeling incorporating the above changes before you release the product for shipment Amended labeling will supercede all previously accepted ones A stamped copy of labeling is enclosed for your records

If you have any questions please contact Hope Johnson at 703 305 5410

Sincerely

Kable Bo Davis Product Manager 25 Herbicide Branch Registration Division (7505P)

Q6H / SureStart / MSTR Amend / 07 10 12 file SureStart 570 MSTR 10Jul12d docx

SureStart<sup>®</sup> EPA Reg No 62719 570

**Registration Notes** 

Source section 3 labeling based on EPA accepted label dated November 22 2011 Following are changes by amendment

1 Application Restrictions revised maximum application rates to state 3 pints per acre in a single application per section 3 supplemental label EPA accepted January 28 2009

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- 2 Application Timing and Methods added use directions for Fall and Spring Early Preplant Applications per section 3 supplemental label EPA accepted February 7 2008
- 3 Use Rates revised to include 3 pint rates
- 4 Dry Bulk Fertilizer Impregnation revised fertilizer mix rates to add 2 5 2 75 and 3 pt/acre rates

<sup>®</sup>Trademark of Dow AgroSciences LLC

(Base label)

### SureStart<sup>®</sup>

#### Herbicide

For use on herbicide tolerant and conventional field corn, and silage corn

Group	15	2 4	HERBICIDE	]
Active Ingredients acetochlor 2 chloro ethoxymethylao flumetsulam <i>N</i> (2 6		↓ 41 67%	ACC	EPTED
methyl 1 2 4 tri pyrimidine 2 su	azolo [1 5a]	1 3% xylic		UG 0 2 2012 P d _1 L stor c de L c hud -+ de Act
acid monoetha Other Ingredients Total		4 27% 52 76% 100 00%	es ameria	101 101 10 10 1010100

Acid equivalent clopyralid 3.6 dichloro 2 pyridinecarboxylic acid - 3.24% (0.29 ib/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

#### **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
- 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

[ Editor s note (Overflow text on base label) The referral statement See Environmental Hazards section of label booklet for Ground Water Advisory Statements may be substituted for the following Ground Water Advisory statements on the base label ]

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

#### Nonrefillable containers 5 gallons or less

#### Storage and Disposal

Do not contaminate water food or feed by storage or disposal

**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.

**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 Handling** Nonrefillable container Do not reuse or refill this container Offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration or by other procedures allowed by state and local authorities

Triple rinse or pressure rinse container (or equivalent) promptly after emptying **Triple rinse** as follows Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip Fill the container 1/4 full with water and recap Shake for 10 seconds Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal Drain for 10 seconds after the flow begins to drip Repeat this procedure two more times **Pressure rinse** as follows Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal Insert pressure rinsing nozzle in the side of the container and rinse at about 40 psi for at least 30 seconds Drain for 10 seconds after the flow begins to drip

#### Refillable containers larger than 5 gallons

#### Storage and Disposal

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**Container Handling** Refillable container Refill this container with pesticide only Do not reuse this container for any other purpose

Cleaning the container before final disposal is the responsibility of the person disposing of the container Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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Triple rinse or pressure rinse container (or equivalent) promptly after emptying **Triple rinse** as follows Empty the remaining contents into application equipment or a mix tank Fill the container 1/4 full with water Replace and tighten closures Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds Stand the container on its end and tip it back and forth several times Turn the container over onto its other end and tip it back and forth several times Empty the rinsate into application equipment or a mix tan or store rinsate for later use or disposal Repeat this procedure two more times **Pressure rinse** as follows Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal Insert pressure rinsing nozzle in the side of the container and rinse at about 40 psi for at least 30 seconds Drain for 10 seconds after the flow begins to drip

#### Refer to label booklet for Directions for Use

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

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

EPA Reg No 62719 570

EPA Est

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Produced for Dow AgroSciences LLC 9330 Zionsville Road Indianapolis IN 46268

Net Contents

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(cover/shipping container)

## SureStart<sup>®</sup>

#### Herbicide

For use on herbicide tolerant and conventional field corn and silage corn

Group	15	2.4	HERBICIDE
Active Ingredients			
acetochlor 2 chlore	2 methyl 6	ethyl N	
ethoxymethyla	•	41 67%	
flumetsulam N (26	6 difluorophen	yl) 5	
methyl 1 2 4 tr	azolo [1 5a]		
pyrimidine 2 st	Ilfonamide	1 3%	
clopyralid 36 dich		ecarboxylic	
acid monoetha			
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

#### Agricultural Use Requirements

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(Page 1 through end)

#### **Precautionary Statements**

### Hazards to Humans and Domestic Animals

### CAUTION

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#### **Personal Protective Equipment (PPE)**

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#### Applicators and other handlers must wear

- Coveralls over short sleeved shirt and short pants
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- 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

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Users should

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#### **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
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#### Storage and Disposal

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#### Nonrefillable containers 5 gallons or less

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#### Product Information

SureStart<sup>®</sup> herbicide is designed for use on herbicide tolerant (such as Roundup Ready<sup>®</sup> or Liberty Link<sup>®</sup>)

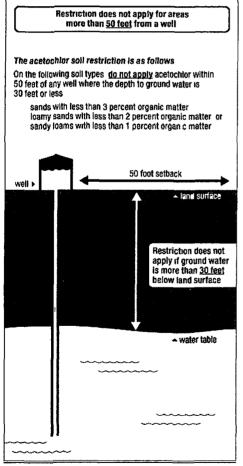
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and conventional field corn and silage corn. It may be used in preplant preemergence or early postemergence applications in corn. It is designed to provide early season control of grass and broadleaf weeds to allow for optimal timing of the in crop 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 specified 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<sup>®</sup> DMA or Roundup<sup>®</sup>) glufosinate (Liberty<sup>®</sup>) or paraquat (Gramoxone) and/or 2.4 D with SureStart

#### **Use Precautions and Restrictions**

On the following soil types do not apply this product within 50 feet of any well where the depth to groundwater is 30 feet or less sands with less than 3% organic matter loamy sands with less than 2% organic matter or sandy loams with less than 1 percent organic matter. See the figure for additional clarification



- 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 applications 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

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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 Restrictions**

- 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 Rates The total cumulative maximum application amount of SureStart on corn is 3.5 pints per acre per crop season
- Do not exceed 3 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 /2 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 rainfail 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 weed control in corn

Soil applied organophosphate insecticides (except terbufos or phorate see below) should be applied in a T band or a band to avoid potential crop injury

- Terbufos (Counter insecticide products) or phorate (Thimet insecticide products ) should not be used
- Soil insecticides from other classes of chemistry may be applied in furrow T banded or banded

#### Soil Insecticide Advisories for Postemergence Applications

 Do not apply SureStart postemergence if corn was previously treated with terbufos (Counter insecticide products) or phorate (Thimet insecticide products) 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<sup>®</sup> Aztec or Fortress insecticides may cause temporary crop injury

#### 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

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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
- 5 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	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 and all other crops	26 months (6)

Numbers within parentheses () in the table refer to Specific Rotational Crop Requirements 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 Canola and all other crops requires a 26 month rotation interval and a successful field bioassay

**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.

#### Weed Resistance Management Guidelines

This product contains acetochlor a Group 15 herbicide flumetsulam a Group 2 herbicide and clopyralid a Group 4 herbicide Any weed population can contain plants naturally resistant to Group 15 4 or 2 herbicides but may be effectively managed utilizing another herbicide from a different Group and/or by using cultural or mechanical practices. However, any herbicide mode of action classification by itself may not adequately address specific weeds that are resistant to specific herbicides. Consult your Dow AgroSciences representative state cooperative extension service professional consultants or other qualified authorities to determine appropriate actions for treating specific resistant weeds.

#### Best Management Practices

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is recommended. A diversified weed management program may include the use of multiple herbicides with different modes of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using full labeled rates and following directions for use is important to delay the selection for resistance. Scouting after a herbicide application is important because it can facilitate the early identification of weed shifts and/or weed resistance and thus provide direction on future weed management practices. One of the best ways to contain resistant populations is to implement measures to avoid allowing weeds to reproduce by seed or to proliferate vegetatively. Cleaning equipment between sites and avoiding movement of plant material between sites will greatly aid in retarding the spread of resistant weed seed.

#### General principles of herbicide resistance management

- 1 Apply integrated weed management practices Use multiple herbicide modes of action with overlapping weed spectrums in rotation sequences or mixtures
- 2 Use the full recommended herbicide rate and proper application timing for the hardest to control weed species present in the field
- 3 Scout fields after herbicide application to ensure control has been achieved. Avoid allowing weeds to reproduce by seed or to proliferate vegetatively.
- 4 Monitor site and clean equipment between sites

#### For annual cropping situations also consider the following

- Start with a clean field and control weeds early by using a burndown treatment or tillage in combination with a preemergence residual herbicide as appropriate
- Use cultural practices such as cultivation and crop rotation where appropriate
- Use good agronomic principles that enhance crop competitiveness
- Use new commercial seed that is as free of weed seed as possible

## Report any incidence of repeated non performance of this product on a particular weed to your Dow AgroSciences representative local retailer or county extension agent

#### 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 manufacturers instructions 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 specified 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

- 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 specified 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 specified 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 paraguat 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 and 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

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as Durango DMA or Roundup or a glufosinate product such as Liberty to control emerged weeds in herbicide tolerant corn

#### Fall and Spring Early Preplant

SureStart herbicide may be applied in the fall or early spring at 2 0 3 0 pints per acre

**Fall Applications** Following soybean harvest apply to soybean stubble after October 15 when the sustained soil temperature at 4 inch depth is less than 50 degrees 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 3.5 pints per acre.

**Spring Early Preplant Applications** On medium and fine textured soils SureStart may be applied 21 or more days prior to planting lif the application is made less than 21 days prior to planting please refer to the use rate table below for specific product rate recommendations

**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.

**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 DMA 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 DMA 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 glyphosate tolerant 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

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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

#### 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.

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

Table 1 Soil Texture Groupings for SureStart Use Rate Selection

#### **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 DMA 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 SureStart may be used at rates from 1 5 to 3 0 pints per acre. Use rates in the higher end of the rate range for soil type (see table below) for longer residual activity. Apply 2 0 3 0 pints per acre in fall or spring early preplant applications.

Soit	Soil Organic Matter Content		
Texture	Less Than 3%	3% or Greater Pints/Acre	
	Pints/Acre		
Coarse	15-20	15-20	
Medium	15-25	1 75 – 3 0	
Fine	20-30	20-30	

#### Target Weeds Controlled or Partially Controlled by SureStart at Specified 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 (marestail)	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			
panıcum fall	mustard wild			
panıcum 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 DMA 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 DMA 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.

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- 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
  - a Immediately after completing the jar inversions
  - b After allowing the jars to stand undisturbed for 30 minutes
  - c 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 SureStart<sup>1</sup>

Forthbook		_	L.
Fertılızer	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 <sup>2</sup>	45	0	0

<sup>1</sup> Do not impregnate on fertilizers containing ammonium nitrate potassium nitrate or sodium nitrate

<sup>2</sup> 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	Acres	SureStart Rate (pints/acr				e)	
Rate	Covered	15	1 75	20	25	2 75	30
(lb/acre)	acre) (per ton)	Pints Herbicide/Ton Fertilizer					
200	10	15	17 5	20	25	27 5	30
300	67	10	117	13 4	16 8	18 4	20 1
400	5	7 5	88	10	12 5	13 8	15
500	4	6	7	8	10	11	12
600	33	5	58	66	83	91	99
700	29	4 4	51	58	73	8	87

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

SureStart (pints/acre) X 200 Pounds of fertilizer/acre

X 2000 = Pints of SureStart 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.

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