

PLEASE NOTE

**This image contains more than one label
approved for this product on this date.**



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

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

December 16, 2008

Ms. Kimberly Gilbert
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Ms. Gilbert:

RE: ADMINISTRATIVE LETTER OF SEPTEMBER 16, 2008 – SUPPLEMENTAL LABEL FOR GRASS AND WEED CONTROL IN LETTUCE USING KERB 3.3 SC HERBICIDE, EPA REG. NO. 62719-578 – AERIAL APPLICATION, AND ADMINISTRATIVE LETTER OF SEPTEMBER 16, 2008 - SUPPLEMENTAL LABEL FOR CHEMIGATION AND USE IN LETTUCE, ENDIVE, ESCAROLE, OR RADICCHIO USING KERB 3.3 SC HERBICIDE, EPA REG. NO. 62719-578.

AERIAL APPLICATION:

Your supplemental label using aerial application is approved with the following comments and changes:

- There is only a pesticide tolerance for head lettuce. Under the label title, KERB® SC, change "For Grass and Weed Control in Lettuce – Aerial Application" to "For Grass and Weed Control in Head Lettuce – Aerial Application".
- In the second paragraph under "Directions for Use", change all references to "lettuce" to "head lettuce".

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CHEMIGATION, BROADCAST, BANDED, AND BED-TOPPED APPLICATIONS:

Your supplemental label for chemigation, broadcast, banded, and bed-topped applications is approved with the following comment and changes:

- On page 1 of the label under the title "Kerb® SC" add "Head" before "Lettuce" and "Greens" after "Radicchio".

- On page 1 of the label under "Directions for Use", first paragraph, per telecommunications (12/15/08) with Registrant, remove the sentence "Application may be made preemergence or postemergence to the crop." The sentence contradicts the last sentence in paragraph. The second paragraph directs applicator to use rates depending on soil type. No directions are provided for use rates depending on soil type. Provide a table with use rates depending on soil types for these chemigation uses

- On page 2, in paragraph starting with "Mixing:", the third sentence says "Add Kerb SC water soluble packets slowly and allow packets, etc." This product is not in soluble packets. Remove this sentence.

- On page 2, in "Chemigation Use Restrictions, etc.", change "Chemigation Use Restrictions for Lettuce, Endive, Escarole or Radicchio" to "Chemigation Use Restrictions for Head Lettuce, Endive, Escarole or Radicchio Greens".

Change the first bullet from "Do not apply Kerb SC to direct seeded varieties that will be harvested less than 55 days after treatment or transplanted lettuce, etc." to "Do not apply Kerb SC to direct seeded varieties of head lettuce, endive, escarole, and radicchio greens that will be harvested less than 55 days after treatment or transplanted head lettuce, etc." In the second bullet, change "Do not apply more than one application of Kerb SC to each crop of lettuce, endive, escarole, or radicchio greens." to "Do not apply more than one application of Kerb SC per season to head lettuce, endive, escarole, or radicchio greens. In the third bullet, change "Do not apply Kerb SC postemergence to leaf lettuce, etc." to "Do not apply Kerb SC postemergence to head lettuce, etc."

- On page 3 of label, change "Use in Lettuce (For Use in Arizona and California)" to "Broadcast, Banded, and Bed-Topped Application to Head Lettuce (For Use in Arizona and California)". In the first paragraph change "...or transplanted lettuce which ..." to "...or transplanted head lettuce which ...". Under "Dosage", precede the two references to "lettuce" with "head lettuce".

- At the top of page 4, under the soil texture table for broadcast application, change reference number 1 from "Reduce dosage rate accordingly for banded applications." to "Reduce dosage rate accordingly for banded and bed-topped applications." Change all "lettuce" to "head lettuce under Crop Tolerance, Timing and Method of Application, Application Dependent on Natural Rainfall, and Furrow Irrigation-Mechanical Incorporation.

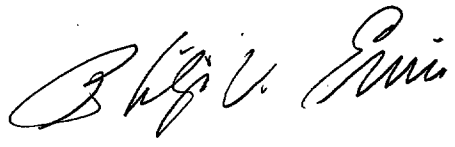
- Change "lettuce" to "head lettuce" on page 5 under Rotation Crops. Also change "Specific Use Restrictions-Lettuce" to "Specific Use Restrictions- Head Lettuce". And change the second bullet from "Do not apply more than one application of Kerb SC to each crop of lettuce." To "Do not apply more than one application of Kerb SC to head lettuce/season."

Per our telecommunication with Amy Hudson and myself on 12/16/08, it is acceptable if the Broadcast, Banded, and Bed-Topped applications to head lettuce are deleted from the label.

Provide revised/corrected supplemental labels before shipment. Stamped copies of your labels with comments are enclosed.

For additional assistance in this matter, please contact me at 703-305-6663/
Errico.Philip@epa.gov.

Sincerely,



Philip V. Errico, Chemist
Herbicide Branch/Registration Div. 7505P

Enclosures: Supplemental Labels for Aerial Application of Kerb SC to Head Lettuce, and Chemigation to Head Lettuce, Endive, Escarole, or Radicchio Greens.

Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Restricted Use Pesticide

Because pronamide has produced tumors in laboratory animals, this product is 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.

Kerb® SC

EPA Reg. No. 62719-578

For Grass and Weed Control in Lettuce - Aerial Application

(For Use in Arizona and California)

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read this supplemental labeling and the label affixed to the container for Kerb® SC herbicide before applying.
- All applicable use directions, precautions and restrictions on the product label for Kerb SC as well as this supplemental labeling must be followed.

Directions for Use

Notice: Before using this product, read the entire Precautionary Statements, Conditions of Sale and Warranty, Directions for Use, Use Restrictions, and Storage and Disposal Instructions. If the Conditions of Sale and Warranty are not accepted, return the product unopened within thirty days of purchase to the place of purchase. This product contains 3.3 lbs active ingredient pronamide per gallon.

Kerb® SC herbicide may be applied by aircraft for preemergence control of susceptible grasses and broadleaf weeds in lettuce. Kerb SC must be applied at the dosage rate of 1.2 to 2.4 qts of product (1.0 to 2.0 pounds active ingredient) per treated acre depending on soil type (refer to comments under Dosage Chart on the EPA-registered label). Mix the specified amount of Kerb SC in 10 to 20 gallons of water per acre for aerial application. For aerial applications of Kerb SC on lettuce, consult the label carefully for plantback information. Avoid drift to all other crops and non-target areas.

ACCEPTED
with COMMENTS
In EPA Letter Dated

12/16/2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719-578

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R578-001

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NEXT

LABEL

ACCEPTED
with COMMENTS
In EPA Letter Dated

12/16/2018

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

62719-578

Supplemental Labeling



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Kerb® SC

EPA Reg. No. 62719-578

Chemigation Application on Lettuce, Endive, Escarole or Radicchio (For Use in Arizona and California)

Use in Lettuce (Transplanted and Leaf Lettuce) (For Use in Arizona and California)

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- All applicable use directions, precautions and restrictions on the product label for Kerb SC as well as this supplemental labeling must be followed.

Directions for Use

Chemigation Application on Lettuce, Endive, Escarole or Radicchio (For Use in Arizona and California)

Notwithstanding chemigation prohibition on package label, this supplemental permits chemigation on the crops listed. Kerb® SC herbicide may be applied by chemigation for weed control in direct seeded or transplanted lettuce, endive, escarole or radicchio but must be applied prior to weed emergence. Application may be made preemergence or postemergence to the crop. **Do not apply postemergence to leaf lettuce, endive, escarole, or radicchio greens.**

Application Rate: Apply Kerb SC at the rate of 1.25 to 2.5 pints per acre (0.5 to 1.0 lb active ingredient per acre) depending upon soil type, weed species and level of infestation.

Application Moisture Requirements: Kerb SC acts mainly through root absorption; therefore, it is necessary to move Kerb SC into the root zone of germinating weeds to provide effective control. This can be accomplished by applying a minimum of 0.75 inch of overhead sprinkler irrigation when applied by chemigation to fields that have been pre-irrigated.

Time of Treatment: Applying Kerb SC following initial irrigation of the crop will limit movement of the herbicide below the root zone of germinating weeds and may improve weed control. The optimal application timing following pre-irrigation will vary depending season, weed species present and environmental conditions. The following recommendations are provided as a general guideline:

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Timing	Date	Application Timing (Days After Starting Sprinklers)
early	Sept. 1 to Oct 15	1 – 3
mid	Oct 15 to Dec 15	3 – 6
late	Dec 15 to Jan	5 – 6

Chemigation Equipment: Kerb SC may be applied through center pivot, lateral move, solid set or hand move systems capable of uniform delivery of the herbicide. Solid set or hand move systems should be capable of delivering a uniform pressure of 60 to 70 psi at all nozzles. Pipes and nozzles must be positioned to provide uniform coverage of the treatment area. Placement of nozzles in diamond shaped (♦) pattern will provide more uniform coverage. Do not apply when wind velocity is sufficient to distort uniformity of coverage or cause drift to susceptible non-target plants.

The injection-metering pump must be calibrated as specified by the manufacturer and checked periodically during application to insure proper operation. Pesticide injection hoses, which connect chemigation-metering equipment to the sprinkler irrigation system, should be of braided reinforced construction with an internal tube made of nylon, cross-linked polyethylene, or high-density polyethylene.

Mixing: Mixing tanks should be large enough to contain the entire amount of herbicide mixture for the area to be treated. Use a minimum of 3 gallons of water per 1.2 pints of Kerb SC. Add Kerb SC water soluble packets slowly and allow packets to disperse completely before beginning injection. Agitation of the herbicide mixture is required at all times during mixing and application (injection).

Application: For hand move or solid set systems set to deliver about 1/10 inch of water per hour, Kerb SC should be injected over a period of 1 to 2 hours. Once the herbicide has been injected, continue irrigation for at least the time required to flush the system and deliver additional irrigation sufficient to incorporate the herbicide into the upper inch of soil.

Chemigation Use Restrictions for Lettuce, Endive, Escarole or Radicchio

- Do not apply Kerb SC to direct seeded varieties that will be harvested less than 55 days after treatment or transplant or to leaf lettuce that will be harvested within 35 days of application.
- Do not apply more than one application of Kerb SC to each crop of lettuce, endive, escarole, or radicchio greens.
- Do not apply Kerb SC postemergence to leaf lettuce, endive, escarole, or radicchio greens.
- Do not apply more than 2.5 pints (1.0 lb ai) per acre of Kerb SC.

Chemigation Instructions

Do not apply this product through any irrigation system unless the instructions for chemigation are followed. Apply this product only through continuously moving center pivot, lateral move end tow, solid set, or hand move irrigation systems. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems on the pesticide container label are in place.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Sprinkler Chemigation

1. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system.
2. The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back-flow.
3. The pesticide injection pipeline must contain a functional automatic, quick closing check valve to prevent the fluid back toward the injection pump.
4. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
5. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
6. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point that pesticide distribution is adversely affected.
7. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
8. **Do not** apply when wind speed favors drift beyond the area intended for treatment.

Use in Lettuce (Transplanted and Leaf Lettuce) (For Use in Arizona and California)

Kerb SC is a selective herbicide for the control of certain annual grasses and broadleaf weeds in direct seeded leaf lettuce or transplanted lettuce which will be harvested 35-days or more after application of Kerb SC.

Weeds Controlled

Kerb SC is effective at 2.5 to 3.75 pints of product (1.0 to 1.5 pounds active ingredient) per treated acre for the preemergence control of the following weeds:

Grasses		Broadleaf Weeds	
Barley, Foxtail	Goosegrass	Carpetweed	Nettle, Burning
Barley, Volunteer	Lovegrass	Chickweed, Common	Nightshade, Black
Barnyardgrass	Oats, Volunteer	Goosefoot, Nettleleaf	Nightshade, Hairy
Bluegrass, Annual	Panicum, Fall	Henbit	Purslane, Common
Brome, Downy (Cheatgrass)	Ryegrass, Italian	Knotweed	Rocket, London [†]
Canarygrass	Rye, Volunteer	Lambsquarters, Common	Shepherdspurse [†]
Crabgrass	Wheat, Volunteer	Morningglory, Annual	Smartweed, Pale
Foxtail, Yellow		Mustard, Wild [†]	Tomato, Volunteer

[†] Suppression only

Dosage

Kerb SC may be applied at the rate of 2.5 to 3.75 pints of product (1.0 to 1.5 pounds active ingredient) per acre broadcast application. The dosage rate required is dependent on soil texture. At rates specified on this label, Kerb SC may not be used for weed control on highly organic (peat and muck) soils. For direct seeded leaf lettuce and transplanted lettuce follow the dosage instructions listed in the chart on the next page.

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Pints Kerb SC Per Acre Broadcast Application ¹		
Weeds	Dependable Rainfall or Overhead Irrigation	Soil Texture Group ²
Susceptible annual grasses and broadleaf weeds	2.4- 3.6 (Surface application)	Coarse and medium textured soils
	3.6 (Surface application)	Fine textured soils

¹ Reduce dosage rate accordingly for banded applications.

² Soil Texture Group

Coarse: sand, loamy sand, sandy loam

Medium: loam, silt loam, silt, sandy clay loam

Fine: silty clay loam, clay loam, sandy clay, silty clay, clay

Crop Tolerance

Most varieties of leaf lettuce and transplanted lettuce are highly tolerant of the specified rates of Kerb SC.

Timing and Method of Application

Kerb SC can be applied either pre-plant, post-plant or postemergence to transplanted or leaf lettuce in banded, bed-topped or broadcast applications. Most applications will be made preemergence to the lettuce just before or after planting and preemergence to the weeds. Applications can be made before or after lettuce thinning but should be made prior to weed emergence. Do not apply Kerb SC to transplanted lettuce or leaf lettuce varieties that will be harvested less than 35 days after the Kerb treatment. Do not apply more than one application of Kerb SC to each crop of lettuce.

Mix the specified amount of Kerb SC in clean water and apply uniformly with a ground sprayer in 20 to 50 gallons of water per treated acre. Reduce dosage and volume accordingly for banded treatments. Use a standard low-pressure sprayer equipped with flat fan nozzles that provide uniform spray distribution.

Application-Moisture Requirements

Kerb SC acts mainly through root absorption, therefore it is necessary to move Kerb SC into the root zone of germinating weeds to provide effective control. This should be accomplished only by overhead sprinkler irrigation or by dependable rainfall.

Sprinkler Irrigation

Kerb SC should be applied to the soil surface without mechanical incorporation after direct seeding or transplanting and followed by overhead irrigation. An initial irrigation of 1 or 2 inches should promptly follow the application of Kerb SC, especially in hot weather.

Application Dependent on Natural Rainfall

In areas of dependable natural rainfall, Kerb SC can be applied as a surface treatment preemergence to the weeds. Applications to direct seeded leaf lettuce or transplanted lettuce are most successful when followed by 1/2 to 1 inch of rainfall within two to three days after application.

Furrow Irrigation-Mechanical Incorporation

Kerb SC at dosage rates listed on this label is not recommended in furrow-irrigated lettuce; or where the product is soil incorporated by mechanical means, since weed control will be reduced if these cultural practices are used.

Hoeing, thinning or shallow cultivation of soil treated with Kerb SC will not destroy its herbicidal activity.

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Temperature

Kerb SC is not highly volatile, but it may degrade rather quickly if left exposed on the soil surface in warm weather. If applied when air temperatures exceed 85°F, it should be watered into the soil as soon as possible, preferably within 1 or 2 days.

Rotation Crops

Where rotation crops are to follow within one year of the Kerb SC treatment to lettuce, follow the directions given in the General Information section of the container label under rotation crop planting information.

Specific Use Restrictions—Lettuce (transplanted and leaf lettuce)

- Do not apply Kerb SC to lettuce varieties that will be harvested less than 35 days after treatment.
- Do not apply more than one application of Kerb SC to each crop of lettuce.

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