62719-578 10/19/2011 1 of 7

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

OCT 19 2011

Brian Bret
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Supplemental Labels - add split applications (chemigation and non-chemigation) to head lettuce, endive, escarole or radicchio greens
Kerb 3.3 SC
EPA Reg. No. 62719-578
Applications Dated October 5 & 12, 2011

Dear Mr. Bret:

The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable.

The supplemental labeling must be incorporated into the main product labeling within eighteen (18) months of the date of this letter.

Stamped copies of your supplemental labels are enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

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

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.

Supplemental Labeling

Dow AgroSciences

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

Kerb® 3.3 SC

EPA Reg. No. 62719-578

Split Applications to Head Lettuce, Endive, Escarole and Radicchio Greens

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Kerb® 3.3 SC herbicide before applying. Follow all applicable use directions, restrictions and precautions on the EPA registered label.
- Use of this product according to this supplemental labeling is subject to all restrictions and limitations imposed by the label affixed to the product container.

Directions for Use

Dosage

Kerb 3.3 SC may be applied at the rate of 2.5 to 5.0 pints of product (1 to 2 lb active ingredient) per acre broadcast application. The dosage rate required is dependent on soil texture and method of irrigation. At rates specified on this label, Kerb 3.3 SC may not be applied for weed control on highly organic (peat and muck) soils. (See separate labeling for chemigation instructions.)

For head lettuce, endive, escarole and radicchio greens, follow the dosage instructions listed in chart below:

Pints Kerb 3.3 SC Per Broadcast Acre [1]			
Weeds	**Dependable Rainfall or Overhead Irrigation**	**Less Dependable Rainfall or Furrow Irrigation**	**Soil Texture Group [2]**
susceptible annual grasses	2.5 – 3.5 (surface application)	3.5 – 5.0 (soil incorporation)	coarse and medium textured soils
broadleaf weeds	3.5 – 5.0 (surface application)	5.0 (soil incorporation)	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

ACCEPTED

OCT 19 2011

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

Crop Tolerance
Most varieties of head lettuce are highly tolerant of the specified rates of Kerb 3.3 SC. Do not use more than 3.5 pts Kerb 3.3 SC (1.5 lb active ingredient) on val temp, grande verde and prima verde varieties of crisp head lettuce, or on endive, escarole and radicchio greens.

Timing and Application
Kerb 3.3 SC can be applied either pre-plant, post-plant or postemergence to head lettuce, endive, escarole or radicchio greens in banded, bed-topped or broadcast applications. Most applications will be made preemergence to the crop just before or after planting and preemergence to the weeds. Applications can be made before or after thinning of head lettuce but must be made prior to weed emergence.

Mix the specified amount of Kerb 3.3 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.

Split Application:

Kerb 3.3 SC application can be split so that part of the maximum allowable application rate of the product can be initially applied to head lettuce, endive, escarole or radicchio greens, and the balance of the maximum allowable application rate can be applied up to 10 days later. Total amount of Kerb 3.3 SC applied must not exceed the maximum rates indicated above, up to 5 pts of product (2 lb active ingredient) per acre per crop season.

The value of split applications and optimal timing for the second application will vary depending on season, weed species present and environmental conditions.

Do not apply Kerb 3.3 SC within 55 days of harvest and do not make more than two applications to each crop of head lettuce, endive, escarole or radicchio greens.

Application Moisture Requirements
Kerb 3.3 SC acts mainly through root absorption, therefore it is necessary to move Kerb 3.3 SC into the root zone of germinating weeds to provide effective control. This can be accomplished by overhead sprinkler irrigation, by rainfall or by shallow mechanical incorporation.

Sprinkler Irrigation
Kerb 3.3 SC can be applied to the soil surface without mechanical incorporation after planting or transplanting if overhead irrigation is used. An initial irrigation of 1 to 2 inches must promptly follow the application of Kerb 3.3 SC, especially in hot weather.

Applications Dependent on Natural Rainfall
In areas of dependable natural rainfall, Kerb 3.3 SC can be applied as a surface treatment preemergence to the weeds. Applications to direct seeded or transplanted head lettuce, endive, escarole or radicchio greens are most successful when followed by 1/2 to 1 inch of rainfall within two to three days after application.

Furrow Irrigation -Mechanical Incorporation
Where rainfall is not dependable or supplementary overhead irrigation is not used, shallow pre-plant incorporation is required. PTO-driven incorporators or rolling cultivators that thoroughly mix Kerb 3.3 SC into the top 2 inches of soil are suggested.

Incorporation must be simultaneous or immediately after application of Kerb 3.3 SC, especially in hot weather. Irrigation must be started as soon as possible.

Where furrow irrigation is used, spray application and mechanical incorporation must be made after beds have been formed. Kerb 3.3 SC will not be as effective if disced in prior to bed shaping.
Hoeing, thinning or shallow cultivation of soil treated with Kerb 3.3 SC will not destroy its herbicidal activity.

Temperature
Kerb 3.3 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 must be shallow incorporated or watered into the soil as soon as possible, preferably within 1 or 2 days.

Rotation Crops
Follow the directions given in the Product Information section of this label under Rotation Crop Planting Information.

Head Lettuce/Endive/Escarole/Radicchio Greens - Specific Use Restrictions

- Do not apply Kerb 3.3 SC to head lettuce, endive, escarole, or radicchio varieties that will be harvested less than 55 days after treatment.
- Do not apply more than two applications of Kerb 3.3 SC to each crop of head lettuce, endive, escarole or radicchio greens.
- Do not apply Kerb 3.3 SC to leaf lettuce.
- Do not apply more than 5 pt Kerb 3.3 SC (2 lb active ingredient) per acre per crop season.

This supplemental label expires on November 1, 2014 and must not be used or distributed after this date.

R361-013
EPA accepted: __/__/__
Replaces: Initial

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.

Supplemental Labeling

Dow AgroSciences

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

Kerb® 3.3 SC

EPA Reg. No. 62719-578

Chemigation Application on Head Lettuce, Endive, Escarole and Radicchio Greens Including Split Applications

(For Use in Arizona and California)

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- All applicable use directions, precautions and restrictions on the product label for Kerb 3.3 SC as well as this supplemental labeling must be followed.

Directions for Use

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

Notwithstanding chemigation prohibition on package label, this supplemental permits chemigation on the crops listed. Kerb® 3.3 SC herbicide may be applied by chemigation for weed control in direct seeded or transplanted head lettuce, endive, escarole or radicchio greens but must be applied prior to weed emergence. Application may be made preemergence to head lettuce, endive, escarole, or radicchio greens or postemergence to head lettuce. **Do not apply postemergence to endive, escarole, or radicchio greens.**

Application Rate: Apply Kerb 3.3 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.

Weeds	Pints Kerb 3.3 SC Per Acre Chemigation Application [1]	Soil Texture Group [1]
Susceptible annual grasses and broadleaf weeds	1.25 to 2.5 (Surface application)	Coarse and medium textured soils
	1.25 to 2.5 (Surface application)	Fine textured soils

[1] Soil Texture Group

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

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

Split Application: Kerb 3.3 SC chemigation application can be split so that part of the maximum allowable application rate of the product can be initially applied to head lettuce, endive, escarole or radicchio greens, and the balance of the maximum allowable application rate can be applied up to 10 days later. Total amount of Kerb 3.3 SC applied must not exceed 2.5 pints product (1 lb. active ingredient) per acre per crop season. The Pre-harvest Interval (PHI) of 55 days must be observed.

Application Moisture Requirements: Kerb 3.3 SC acts mainly through root absorption; therefore, it is necessary to move Kerb 3.3 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 3.3 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:

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 3.3 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 3.3 SC. 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 3.3 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 Head Lettuce, Endive, Escarole or Radicchio Greens

- Do not apply Kerb 3.3 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 that will be harvested less than 35 days after application.
- Do not apply more than one application of Kerb 3.3 SC per season to head lettuce, endive, escarole, or radicchio greens, or no more than two applications if a split application is made.
- Do not apply Kerb 3.3 SC postemergence to endive, escarole, or radicchio greens.

- Do not apply more than 2.5 pints of Kerb 3.3 SC (1 lb active ingredient) per acre for one single application per crop or in total if split application per crop.

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.

This supplemental label expires on November 1, 2014 and must not be used or distributed after this date.

R361-014
EPA accepted: __/__/__
Replaces: R361-011