

67690-42 2.15.2008

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 15 2008

Ms. Amy Dugger-Ronyak
Regulatory Affairs Specialist
SePRO Corporation
11550 N. Meridian St., Ste 600
Carmel, IN 46032-4565

RE: Notification of Addition of Statement regarding New York 24(c) Special Local Need label
EPA Registration Number: 67690-42
Date of Submission: January 21, 2008

Dear Ms. Dugger-Ronyak:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated, January 21, 2008, for the product, Renovate Granular. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

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

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



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

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United States
Environmental Protection Agency
Washington, DC 20460

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

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 67690-42	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Renovate Granular	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) SePRO Corporation 11550 N. Meridian St., Ste. 600 Carmel, IN 46032-4565 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

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

NOTIFICATION

FEB 15 2008

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

Addition of statement regarding New York State 24(c) Special Local Need label requirement.

Section - III

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

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Amy Dugger-Ronyak	Title Regulatory Affairs Specialist	Telephone No. (Include Area Code) 317-580-8286
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Specialist	
4. Typed Name Amy Dugger-Ronyak	5. Date January 21, 2008	

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[BASE LABEL]

NOTIFICATION

FEB 15 2008



Renovate[®] Granular

Aquatic Sites: For control of emersed, submersed and floating aquatic weeds in the following aquatic sites: ponds; lakes; reservoirs; marshes; wetlands; impounded rivers, streams and other bodies of water that are quiescent; non-irrigation canals, seasonal irrigation waters and ditches which have little or no continuous outflow.

For use in New York State, comply with Section 24(c) Special Local need labeling for Renovate[®] OTF, SLN NY-070004

Active Ingredient:

triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, triethylamine salt 14.0%

Other Ingredients 86.0%

Total 100.0%

(Acid equivalent: triclopyr - 10.0%)

KEEP OUT OF REACH OF CHILDREN CAUTION / PRECAUCIÓN

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

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes moderate eye irritation. Avoid contact with eyes or clothing.

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> 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.
If on skin or clothing	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> Move person to fresh air.

- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency endangering health or the environment involving this product, call **INFOTRAC at 1-800-535-5053**.

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.

Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may cause fish suffocation. Therefore, to minimize this hazard **DO NOT** treat more than one-half (1/2) of the water area in a single operation and wait at least 10 days between treatments when susceptible plants are mature and have grown to the water's surface, or when the treatment would result in significant reductions in total plant biomass. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State agency for fish and game before applying to public water to determine if a permit is needed.

STORAGE AND DISPOSAL

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Do not contaminate water, food, or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in original container. Do not store near food or feed. In case of leak or spill, contain material and dispose as waste.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL (PLASTIC BAGS): Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

AGRICULTURAL CHEMICAL: Do not ship or store with food, feeds, drugs or clothing.

Refer to label booklet for additional precautionary information and 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 unacceptable, return at once unopened.**

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If you wish to obtain additional product information, please visit our web site at www.sepro.com.

EPA Reg. No. 67690-42
FPL011808

EPA Est. No. _____
SPC-XXXXXX

Renovate is a registered trademark of Dow AgroSciences LLC.

**SePRO Corporation • 11550 N. Meridian Street, Suite. 600, Carmel, IN 46032
U.S.A.**

Herbicide

Net Contents: _____

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[BOOKLET FRONT LABEL]



Renovate[®] Granular

Aquatic Sites: For control of emersed, submersed and floating aquatic weeds in the following aquatic sites: ponds; lakes; reservoirs; marshes; wetlands; impounded rivers, streams and other bodies of water that are quiescent; non-irrigation canals, seasonal irrigation waters and ditches which have little or no continuous outflow.

For use in New York State, comply with Section 24(c) Special Local need labeling for Renovate[®] OTF, SLN NY-070004

Active Ingredient:

triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, triethylamine salt 14.0%

Other Ingredients 86.0%

Total 100.0%

(Acid equivalent: triclopyr - 10.0%)

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AGRICULTURAL CHEMICAL: Do not ship or store with food, feeds, drugs or clothing.

Refer to inside of label booklet for additional precautionary information and Directions for Use including Storage and Disposal.

NOTICE: Read the entire label. Use only according to label directions. **Before using this product, read *Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies* at end of label booklet. If terms are unacceptable, return at once unopened.**

If you wish to obtain additional product information, visit our web site at www.sepro.com.

EPA Reg. No. 67690-42
FPL011808

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SPC-XXXXXX

Renovate is a registered trademark of Dow AgroSciences LLC.

**SePRO Corporation • 11550 N. Meridian Street, Suite. 600, Carmel, IN 46032
U.S.A.**

Herbicide

Net Contents: _____

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[LABEL BOOKLET]

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PRECAUTIONARY STATEMENTS**HAZARD TO HUMANS AND DOMESTIC ANIMALS****CAUTION / PRECAUCIÓN**

Causes moderate eye irritation. Avoid contact with eyes or clothing.

FIRST AID	
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<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency endangering health or the environment involving this product, call INFOTRAC at 1-800-535-5053.</p>	

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.

ENVIRONMENTAL HAZARDS

Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may cause fish suffocation. Therefore, to minimize this hazard **DO NOT** treat more than one-half (1/2) of the water area in a single operation and wait at least 10 days between treatments when susceptible plants are mature and have grown to the water's surface, or when the treatment would result in significant reductions in total plant biomass. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State agency for fish and game before applying to public water to determine if a permit is needed.

AGRICULTURAL CHEMICAL: Do not ship or store with food, feeds, drugs or clothing.

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.

GENERAL INFORMATION

When applying this product follow all applicable use directions, precautions and limitations.

For Aquatic and Wetland Sites:

Use Renovate[®] Granular herbicide for control of emersed, submersed and floating aquatic weeds in the following aquatic sites: ponds; lakes; reservoirs; marshes; wetlands; impounded rivers, streams and other bodies of water that are quiescent; non-irrigation canals, seasonal irrigation waters and ditches which have little or no continuous outflow.

Obtain Required Permits: Consult with appropriate state or local water authorities before applying this product in and around public waters. State or local public agencies may require permits.

Recreational Use of Water in Treatment Area: There are no restrictions on use of water in the treatment area for recreational purposes, including swimming and fishing.

Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

GENERAL USE PRECAUTIONS AND RESTRICTIONS

For use in New York State, comply with Section 24(c) Special Local need labeling for Renovate[®] OTF, SLN NY-070004

Chemigation: Do not apply this product through any type of irrigation system.

Irrigation: Water treated with Renovate Granular may not be used for irrigation purposes for 120 days after application or until triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less. This label describes both required and recommended uses of a chemical analysis for the active ingredient, triclopyr. SePRO Corporation recommends the use of an Enzyme-Linked Immunoassay (ELISA) test for the determination of the active ingredient concentration in water. Contact SePRO Corporation for the incorporation of this

analysis in your treatment program. Other proven chemical analysis for the active ingredient may also be used. The ELISA analysis is referenced in this label as the preferred method for the rapid determination of the concentration of the active ingredient in the water.

- **Seasonal Irrigation Waters:** Renovate Granular may be applied during the off-season to surface waters that are used for irrigation on a seasonal basis, provided that there is a minimum of 120 days between Renovate Granular application and the first use of treated water for irrigation purposes or until triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less.
 - **Irrigation Canals/Ditches:** Do not apply Renovate Granular to irrigation canals/ditches unless the 120 day restriction on irrigation water usage can be observed or triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less.
 - **There is no restriction on use of treated water to irrigate established grasses.**
- Do not apply Renovate Granular directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants, and do not permit dust to drift into these areas.
 - Do not apply to salt water bays or estuaries.
 - Do not apply directly to un-impounded rivers or streams.
 - Do not apply on ditches or canals currently being used to transport irrigation water or that will be used for irrigation within 120 days following treatment or before triclopyr residue levels are determined to be 1.0 ppb or less.
 - Do not apply where runoff water may flow onto agricultural land as injury to crops may result.

Grazing and Haying Restrictions:

Except for lactating dairy animals, there are no grazing restrictions following application of this product.

- **Grazing Lactating Dairy Animals:** Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.
- Do not harvest hay for 14 days after application.
- Grazed areas of sites may be spot treated if they comprise no more than 10% of the total grazable area.

Slaughter Restrictions:

During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

BEST MANAGEMENT PRACTICES FOR DRIFT MANAGEMENT

Equipment used in the application of Renovate Granular should be carefully calibrated to be sure it is working properly and delivering a uniform distribution pattern. Aerial application should be made only when the wind velocity is 2 to 10 mph.

Applications should be made only when there is little or no hazard for volatility or dust drift, and when application can maintain Renovate Granular placement in the intended area. Very small quantities of dust, which may not be visible, may seriously injure susceptible plants, and Renovate Granular may be blown outside of the intended treatment area under extreme conditions. Do not spread Renovate Granular when wind is blowing toward susceptible crops or ornamental plants that are near enough to be injured.

Avoiding drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather related factors determine the potential for drift. The applicator is responsible for considering all these factors when making decisions.

Ground Application Equipment: To aid in reducing drift, Renovate Granular should be applied when wind velocity is low (follow state regulations; see *Sensitive Area* under *Aerial Drift Reduction Advisory* below) or using a slurry injection system.

AERIAL DRIFT REDUCTION ADVISORY

This section is advisory in nature and does not supersede the mandatory label requirements.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces drift potential.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (e.g. higher wind).

Wind: Drift potential is lowest between wind speeds of 2 - 10 mph (follow state regulations). However, many factors, including equipment type, determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. **NOTE:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

Sensitive Areas: Renovate Granular should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

AQUATIC WEEDS CONTROLLED BY RENOVATE GRANULAR

alligatorweed	parrotfeather ^{††}	yellow water lily (<i>Nuphar</i> spp., spatterdock)
American lotus	pickerelweed	white water lily (<i>Nymphaea</i> spp.)
bladderwort	pennywort	water primrose (<i>Ludwigia</i> spp.)
Eurasian watermilfoil	smartweed	watershield (<i>Brasenia</i> spp.)
milfoil species	water chestnut ^{†, ††}	

[†] Not for use in California

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††Retreatment may be needed to achieve desired level of control.

APPLICATION METHODS

Surface Application

Use a mechanical spreader such as a fertilizer spreader or mechanical seeder, or similar equipment capable of uniformly applying Renovate Granular. Before spreading any product, carefully calibrate the application equipment. When using boats and power equipment, you must determine the proper combination of (1) boat speed, (2) rate of delivery from the spreader, and (3) width of swath covered by the granules.

Use the following formula to calibrate the spreader's delivery in pounds of Renovate Granular per minute:

$$\frac{\text{miles per hour X swath width (feet) X pounds per acre}}{495} = \text{pounds per minute}$$

Aerial Application (Helicopter Only)

Ensure uniform application. All equipment should be properly calibrated using blanks with similar physical characteristics to Renovate Granular. To avoid streaked, uneven or overlapped application, use an appropriate tracking device (e.g. GPS). Refer to the *Aerial Drift Reduction Advisory* section of this label for additional precautions and instructions for aerial application.

Floating and Emerged Weeds

For control of water lily's (*Nymphaea* spp. and *Nuphar* spp.), watershield (*Brasenia* spp.), and other susceptible emerged and floating herbaceous weeds, apply 1.0 to 2.5 ppm a.e. triclopyr per acre. Apply when plants are actively growing.

Use higher rates in the rate range when plants are mature, when the weed mass is dense, in areas of greater water exchange, or for difficult to control species. Repeat as necessary to control regrowth, but do not exceed a total of 2.5 ppm a.e. triclopyr for the treatment area per annual growing season.

Submersed Weeds

For control of Eurasian watermilfoil (*Myriophyllum spicatum*) and other susceptible submersed weeds in ponds, lakes, reservoirs, impounded rivers, streams, and other bodies of water that are quiescent; non-irrigation canals, and seasonal irrigation waters, or ditches that have little or no continuous outflow, apply Renovate Granular using mechanical or portable granule spreading equipment. Rates should be selected according to the rate chart below to provide a triclopyr concentration of 0.50 to 2.5 ppm a.e. in treated water. Use of higher rates in the rate range is recommended in areas of greater water exchange. These areas may require a repeat application. However, total application of Renovate Granular must not exceed an application rate of 2.5 ppm a.e. triclopyr for the treatment area per annual growing season.

For optimal control, apply when Eurasian watermilfoil or other submersed weeds are actively growing.

CONCENTRATION OF TRICLOPYR ACID IN WATER (PPM A.E.)						
Avg. Water Depth (ft)	0.5 ppm	0.75 ppm	1.0 ppm	1.5 ppm	2.0 ppm	2.5 ppm
	Pounds Renovate Granular / acre					
1	14	20	27	41	54	67
2	27	41	54	81	108	135
3	41	61	81	122	162	202
4	54	81	108	162	216	270

For applications greater in depth than 4 feet, when targeting difficult to control species and/or in sites with high dilution potential, the following formula should be used to calculate applications rates should greater than 270 pounds of Renovate Granular be needed to achieve desired weed control. **NOTE:** Do not exceed 2.5 ppm a.e. triclopyr for the treatment area per annual growing season.

average depth x target ppm x 27 = pounds of Renovate Granular per acre

Example Calculation:

6 foot average depth x 2.5 ppm x 27 = 405 pounds of Renovate Granular per acre

SMALL SITE (LESS THAN ½ ACRE) / SPOT TREATMENT APPLICATION

For small treatment sites of ½ acre or less use the rate chart below to determine the application rate depending on average water depth to achieve a concentration of 1.25 to 2.5 ppm a.e. Do not exceed 2.5 ppm a.e. triclopyr for the treatment area per annual growing season. Use higher rates in small treatment areas and in areas prone to higher dilution and for heavy weed infestation. Use the lower rates for spot treatment application of areas less prone to dilution and lighter weed infestations. For best results, split the total application rate into three equal applications 8 to 12 hours apart. Apply when water is calm.

Example: A 100 ft. by 40 ft. lakeshore swimming area with a 4 ft. average depth, heavily infested with Eurasian watermilfoil

Step 1: Determine the area to be treated in square feet (ft²) by multiplying the length of the area by the width.

$$\rightarrow 100 \text{ ft.} \times 40 \text{ ft.} = 4,000 \text{ ft}^2$$

Step 2: Determine the amount of Renovate Granular to be used by consulting the *Renovate Granular Rate Chart for Areas Less than ½ Acre*.

\rightarrow Use 24.7 lbs. of Renovate Granular total based on 4 foot average depth in Rate Chart below.

Step 3: Apply Renovate Granular uniformly over weeds in treatment site in three equal applications of 8.2 lbs. each, 8 - 12 hours apart.

RENOVATE GRANULAR RATE CHART FOR AREAS LESS THAN ½ ACRE				
Pounds of Renovate Granular				
Area (ft ²)	3 foot average depth		4 foot average depth	
	1.25 ppm a.e.	2.5 ppm a.e.	1.25 ppm a.e.	2.5 ppm a.e.
500	1.2	2.3	1.5	3.0
1,000	2.3	4.6	3.1	6.1
4,000	9.3	18.6	12.4	24.7
10,000	23.2	46.5	31.0	61.9
20,000	46.5	93.0	62.0	123.9

For applications with an area or depth not included in the above chart, the following formula should be used to calculate application rates.

area (ft²)/43,560 x average depth x target ppm x 27 = pounds of Renovate Granular

Example Calculation:

8,250 ft²/43,560 x 4 foot average depth x 1.25 ppm x 27 = 25.6 pounds of Renovate Granular

Small treatment application of Renovate Granular is recommended with waterproof gloves or a hand spreader to uniformly distribute flakes on target weeds.

Precautions for Potable Water Intakes:

For applications of Renovate Granular to control floating, emersed, and submersed weeds in sites that contain a functioning potable water intake for human consumption, see the chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

CONCENTRATION OF TRICLOPYR ACID IN WATER (PPM AE)					
Area Treated (acres)	0.75 ppm	1.0 ppm	1.5 ppm	2.0 ppm	2.5 ppm
	Required Setback Distance (ft) from Potable Water Intake				
< 4	300	400	600	800	1000
> 4 - 8	420	560	840	1120	1400
> 8 - 16	600	800	1200	1600	2000
> 16 - 32	780	1040	1560	2080	2600
> 32 acres, calculate a setback using the formula for the appropriate rate	Setback (ft) = (800 * ln (acres) - 160)/3.33	Setback (ft) = (800 * ln (acres) - 160)/2.50	Setback (ft) = (800 * ln (acres) - 160)/1.67	Setback (ft) = (800 * ln (acres) -160)/1.25	Setback (ft) = (800 * ln (acres) - 160)

Note: ln = natural logarithm

Example Calculation 1: to apply 2.5 ppm Renovate Granular to 50 acres:

$$\begin{aligned}\text{Setback in feet} &= (800 \times \ln(50 \text{ acres})) - 160 \\ &= (800 \times 3.912) - 160 \\ &= 2970 \text{ feet}\end{aligned}$$

Example Calculation 2: to apply 0.75 ppm Renovate Granular to 50 acres:

$$\begin{aligned}\text{Setback in feet} &= \frac{(800 \times \ln(50 \text{ acres})) - 160}{3.33} \\ &= \frac{(800 \times 3.912) - 160}{3.33} \\ &= 892 \text{ feet}\end{aligned}$$

NOTE: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes.

To apply Renovate Granular around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Wetland Sites

Wetlands include flood plains, deltas, marshes, swamps, bogs, and transitional areas between upland and lowland sites. Wetlands may occur within forests, wildlife habitat restoration and management areas and similar sites as well as areas adjacent to or surrounding domestic water supply reservoirs, lakes and ponds.

For control of emerged, floating or submersed aquatic weeds in wetland sites, follow use directions and application methods associated with the Floating and Emerged or Submersed sections on this label.

Use Precautions

Minimize unintentional application to open water when treating target vegetation in wetland sites. **Note:** Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat such areas.

IF ANY CONTENT ON THIS LABEL IS NOT UNDERSTOOD, OR YOU NEED FURTHER ASSISTANCE, CONTACT A SEPRO AQUATIC SPECIALIST WITH QUESTIONS SPECIFIC TO YOUR APPLICATION.

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STORAGE AND DISPOSAL

Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Do not contaminate water, food, or feed by storage and disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store in original container. Do not store near food or feed. In case of leak or spill, contain material and dispose as waste.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL (PLASTIC BAGS): Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL: Consult federal, state, or local disposal authorities for approved alternative procedures.

TERMS AND CONDITIONS OF USE

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

WARRANTY DISCLAIMER

SePRO Corporation warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. **SEPRO CORPORATION MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

INHERENT RISKS OF USE

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

LIMITATION OF REMEDIES

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

- (1) Refund of purchase price paid by buyer or user for product bought, or

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(2) Replacement of amount of product used.

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

The terms of the *Warranty Disclaimer* above and this *Limitation of Remedies* cannot be varied by any written or verbal statements or agreements. No employee or sales agent of SePRO Corporation or the seller is authorized to vary or exceed the terms of the *Warranty Disclaimer* or *Limitations of Remedies* in any manner.

Renovate is a registered trademark of Dow AgroSciences LLC.

**SePRO Corporation • 11550 N. Meridian Street, Suite. 600, Carmel, IN 46032
U.S.A.**

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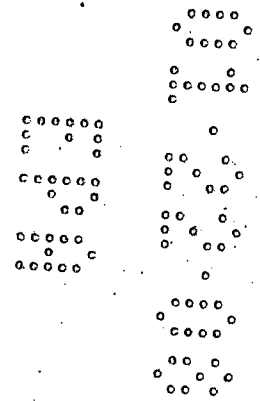


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SePRO Corporation • 11550 North Meridian Street • Suite 600 • Carmel, Indiana 46032-4565 •
Phone: (317) 580-8282 • Fax: (317) 428-4577

January 21, 2008

Mr. Jim Tompkins, Product Manager 25
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501



**RE: Renovate Granular, EPA Reg. No. 67690-42
Addition of statement regarding New York State 24(c) Special Local Need label**

Dear Mr. Tompkins:

SePRO Corporation (EPA Company #67690) here submits a notification to add text alerting users of this product in the state of New York that they must comply with the state issued 24(c) Special Local Need label. The below text is being added directly above the "Ingredients Statement" on both the container base label and the front booklet cover. In addition, this text has also been added to the "Directions for Use" section under "General Use Precautions and Restrictions."

Added text: For use in New York State, comply with Section 24(c) Special Local need labeling for Renovate® OTF, SLN NY-070004

Renovate® OTF is the marketed alternate brand name of Renovate Granular, EPA Reg. No. 67690-42. Renovate® OTF is the name of the product as it is registered and sold at the state level; therefore, the 24(c) SLN language required by the state of New York refers to the alternate brand name, Renovate® OTF.

Please find enclosed the following information to support this request:

- EPA form 8570-1, Application for Pesticide; and
- Five (5) copies of the label with changes highlighted in yellow on one copy.

The Confidential Statements of Formula on file with USEPA have not been altered; therefore, none have been included with this submission.

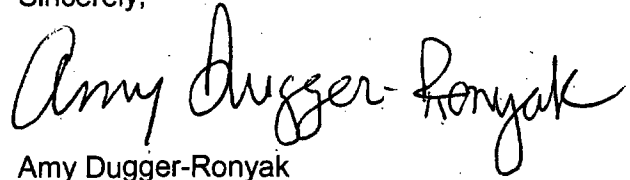
This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false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

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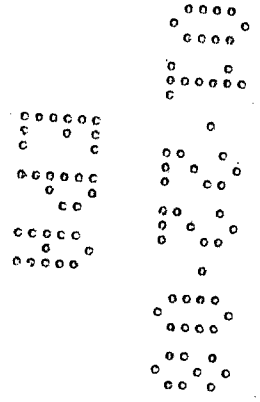
violation of FIFRA and may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions regarding this submission, please contact me at (317) 580-8286.

Sincerely,



Amy Dugger-Ronyak
Regulatory Affairs Specialist
SePRO Corporation



Enclosures