

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

July 2, 2020

Beth Mitchell Regulatory Affairs Manager SePRO Corporation 11550 North Meridian Street; Suite 600 Carmel, IN 46032

Subject: Label Amendment – Minor Changes, Including Change in Primary Brand Name

Product Name: Sculpin G

EPA Registration Number: 67690-49 Application Date: October 8, 2018

Decision Number: 548007

Dear Ms. Mitchell:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Kable Bo Davis by phone at 703-306-0415, or via email at davis.kable@epa.gov.

Sincerely,

Mindy Ondish

Product Manager 23

Herbicide Branch

Registration Division (7505P)

Office of Pesticide Programs

Enclosure

[Editor's note: This portion of the master label contains Professional Uses.1

[Sub-label A: Label for Non-dilatable, Non-refillable, Non-rigid containers, any size]



Active Ingredient

2,4-D GROUP	4 HERBICIDE
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Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

67690-49

Sculpin[®] G

A selective herbicide for controlling certain unwanted aquatic plants.

2,4-dichlorophenoxyacetic acid, dimethylamir	ne salt20.0%
Other Ingredients	
Total	100.0%
NOTICE: Read the entire label before using. Before buying or using this product, read M statements. If terms are unacceptable, retu	/arranty Disclaimer and Misuse
AGRICULTURAL CHEMICAL: Do not ship or	store with food, feeds, drugs or clothing.
Sculpin is a registered trademark of SePRO Co	orporation.
EPA Reg. No. 67690-49 FPL20200616	EPA Est. No [P/N]
SePRO Corporation 11550 N. Meridian St., S	Suite 600, Carmel, IN 46032 U.S.A.
Aquatic Herbicide	Net Weight (Non-Refillable)
PRECAUTIONARY STATEMENTS	

Causes substantial, but temporary eye injury. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap

HAZARD TO HUMANS AND DOMESTIC ANIMALS

and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Wear long-sleeved shirt and long pants, socks, shoes, and gloves.

KEEP OUT OF REACH OF CHILDREN WARNING / AVISO

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.)

	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.
If swallowed	 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	 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.
If on skin or clothing	 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.
	HOTLINE NUMBER

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**.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All loaders, applicators, and other handlers must wear:

- Long-sleeve shirt and long pants;
- Shoes and socks:
- Chemical-resistant gloves; and
- Protective eyewear.

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.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS

Users should:

- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly
 and put on clean clothing. If pesticide gets on skin, wash immediately with soap and
 water.
- 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.

ENVIRONMENTAL HAZARDS

Fish breathe dissolved oxygen in the water and decaying weeds also use oxygen. When treating continuous, dense weed masses, it may be appropriate to treat only part of the infestation at a time. For example, in quiescent waters, apply the product to areas separated by untreated sections that can be treated after vegetation in treated areas has disintegrated. During the growing season, weeds decompose in a 2 to 4 week period following treatment. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Waters having limited and less dense weed infestations may not require partial treatments.

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.

PRODUCT INFORMATION

Use Sculpin G herbicide for control of certain aquatic weeds in: ponds; lakes; reservoirs; marshes; bayous drainage ditches; non-irrigation canals; and rivers and streams that are quiescent or slow-flowing. This product is designed to selectively control the weeds listed on this label. While certain other weeds may be suppressed, control may be incomplete. Reduced control may occur in lakes or ponds where water replacement comes from bottom springs.

Sculpin G is formulated on biodegradable granules that, when applied to water bodies, immediately deliver the herbicide down to the critical areas for controlling target weeds.

When applying Sculpin G follow all applicable use directions, precautions and limitations. All Sculpin G concentrations referred to in this label are based on acid

equivalence (a.e.).

When treating moving bodies of water, applications must be made while traveling upstream to prevent concentration of herbicide downstream from the application.

Resistance Management

For resistance management, Sculpin G is a Group 4 herbicide. Any weed population may contain or develop plants naturally resistant to Sculpin G and other Group 4 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Appropriate resistance management strategies should be followed.

To delay herbicide resistance, take one or more of the following steps:

- Do not use Sculpin G or other target site of action Group 4 herbicides that might have a similar target site of action, on the same weed species.
- Use tank mixtures or premixes with herbicides from different target site of action Groups as long as the involved products are all registered for the same use, have different sites of action and are both effective at the tank mix or prepack rate on the weed(s) of concern.
- Base use on a comprehensive Integrated Pest Management (IPM) program.
- Monitor treated weed populations for loss of field efficacy.
- Contact your local extension specialist, certified crop advisors and/or manufacturer for herbicide resistance management and/or integrated weed management measures for specific crops and resistant weed biotypes.

Obtain Required Permits: Consult with appropriate state or local pesticide and/or water authorities before applying this product in or around public waters. Permits and posting or treatment notification may be required by state or local public agencies.

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

Livestock Use of Water from Treatment Area: There are no restrictions on consumption of treated water for potable use by livestock, pets, or other animals.

Use Restrictions

- **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.
- **DO NOT** enter or allow people (or pets) to enter the treated area until dusts have settled.
- For requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.
- Chemigation: DO NOT apply Sculpin G through any type of irrigation system.

- Applications to a target area are limited to two (2) per season.
- Apply a maximum of 65.4 pounds of Sculpin G (10.8 lbs a.e.)/acre-foot per application. **DO NOT** exceed 4.0 ppm during any single application.
- **DO NOT** apply within 21 days of previous application except when conducting split treatments. Split treatments, over relatively short periods of time (e.g., 1 to 4 days), may be effective in some areas to maintain adequate exposure with target plants, such as small sites or sites with higher dilution potential.

APPLICATION TO WATERS USED FOR IRRIGATION Irrigation Restrictions

- DO NOT use treated water for irrigating greenhouse or nursery plants unless 2,4-D concentrations are confirmed to be less than 1 ppb by laboratory analysis.
- **DO NOT** use water treated with Sculpin G for hydroponic farming unless 2,4-D concentrations are confirmed to be less than 1 ppb by laboratory analysis.
- **DO NOT** apply Sculpin G directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable susceptible broadleaf plants, and **DO NOT** permit dust to drift into these areas.
- This label describes both required and recommended uses of a chemical analysis for the active ingredient 2,4-D. SePRO Corporation recommends the use a FasTEST for the determination of Sculpin G concentration in water. Contact SePRO Corporation for the incorporation of this analysis into your treatment program. Other proven chemical analysis for the active ingredient may also be used. The FasTEST is referenced in this label as the preferred method for the rapid determination of the concentration of the active ingredient in the water.
- If Sculpin G treated water is intended to be used only for crops or non-crop areas that are labeled for direct treatment with 2,4-D such as pastures, turf or established grasses, cereal grains, the treated water may be used to irrigate and/or mix sprays for these sites at any time during and after the application.
- Due to potential phytotoxicity and/or residue considerations, the following restrictions are applicable to other uses of irrigation water:
 - If treated water is intended to be used to irrigate or mix sprays for crops not labeled for direct treatment with 2,4-D, the water must not be used unless <u>one</u> of the following restrictions has been observed:
 - A setback distance described in Table 1 (*Drinking Water Setback Distances*) was used for the application;
 - A waiting period of 21 days from the time of application has elapsed; or
 - An approved assay indicates that the 2,4-D concentration is 100 ppb or less at the water intake. See Table 2 (Sampling for Drinking Water Analysis) for the recommended waiting periods after application but before taking the initial water sample at water intake.
 - If treated water is intended to be used to irrigate non-crop areas not labeled for direct treatment with 2,4-D (e.g., landscape ornamentals) or for other irrigation uses not described, consult with SePRO Corporation prior to commencing irrigation if 2,4-D concentrations are greater than 100 ppb.

APPLICATIONS TO POTABLE WATER SOURCES

Potable Water Restrictions

- The potable water use restrictions on this label are to ensure that consumption of water by the public is allowed only when the concentration of 2,4-D in water is less than the MCL (Maximum Contaminant Level) of 70 ppb. Applicators should consider the unique characteristics of the treated waters to assure that 2,4-D concentrations in potable water do not exceed 70 ppb at the time of consumption.
- The drinking water setback distances from functioning potable water intakes are provided in Table 1.

	TAE	BLE 1	
D	RINKING WATER S	ETBACK DISTANCE	S
Application concentration and minimum setback distance (ft) from functioning potable water intake			
≤1 ppm [†]	1.1 to 2.0 ppm [†]	2.1 to 3.0 ppm [†]	3.1 to 4.0 ppm [†]
600	1,200	1,800	2,400

[†] ppm acid equivalent target water concentration

- Following each application of Sculpin G, treated water must not be used for potable water unless <u>one</u> of the following restrictions has been observed:
 - A setback distance described in Table 1 was used for the application;
 - o A waiting period of at least 21 days from the time of application has elapsed; or
 - An approved assay indicates that the 2,4-D concentration is 70 ppb or less at the water intake. Sampling for drinking water analysis should occur no sooner than stated in Table 2. **NOTE:** Analysis of 2,4-D in drinking water samples must be completed by a laboratory that is certified under the Safe Drinking Water Act to perform drinking water analysis using a currently approved version of analytical Method Number 515, 555, other methods for 2,4-D as may be listed in Title 40 CFR, Part 141.24, or Method Number 4015 (immunoassay of 2,4-D) from U.S. EPA Test Methods for Evaluating Solid Waste SW-846.

	TABLE 2	
SAMPLING FOR	R DRINKING WATER ANA	LYSIS †
Minimum days after application before initial water sampling at the functioning potable water intake		
≤1 ppm ^{††}	1.1 to 3.0 ppm ^{††}	3.1 to 4.0 ppm ^{††}
5	10	14

These are general guidelines, the amount of time required for 2,4-D concentrations to reach acceptable levels for drinking or irrigation will depend on the total acres treated relative to water body size, application rates, water exchange rates, weed density, and various other factors. Consult a SePRO Corporation Aquatic Specialist for site specific recommendations.

• If no setback distance from Table 1 is to be used for the application, applicators or the authorizing organization must provide a drinking water

^{††} ppm acid equivalent target water concentration

notification and an advisory to shut off all potable water intakes inside the setback zone prior to Sculpin G application. Notification to the party responsible for a public water supply or to individual private water users must be done in a manner to assure that the party is aware of the water use restrictions when this product is applied to potable water. The following is an example of a notification via posting, but other methods of notification which convey the above restrictions may be used and may be required in some cases under state or local law or as a condition of a permit.

o Example:

- Posting notification should be located every 250 feet including the shoreline of the treated area and up to 250 feet of shoreline past the application site to include immediate public access points. Posting should include the day and time of application. Posting may be removed if analysis of a sample collected at the intake no sooner than stated in Table 2 shows that the 2,4-D concentration is 70 ppb or less, or after 21 days following application, whichever occurs first.
 - **Text of notification:** "Wait 21 days before diverting functioning surface water intakes from the treated aquatic site to use as drinking water unless water at functioning drinking water intakes is tested no sooner than [insert days from Table 2] and is demonstrated by assay to contain no more than 70 ppb 2,4-D. Application Date: _____ Time: ____."
- NOTE: Existing potable water intakes that are no longer in use, such as those replaced by a connection to a municipal water system or a potable water well, are not considered to be functioning potable water intakes.
- Drinking water setback distances do not apply to terrestrial applications of 2,4-D adjacent to water bodies with potable water intakes.

DRIFT MANAGEMENT

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments applying this product. Applying Sculpin G through an enclosed eductor or slurry injection system via a continuous stream of water and/or injected under the water surface further minimizes drift potential.

Wind Speed

Do not apply at wind speeds greater than 15 mph. Sculpin G may be applied using an enclosed eductor or slurry injection system. Only apply this product if the wind direction favors on-target deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for non-target species, non-target crops) near enough to be injured.

Temperature Inversions

If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or

below application height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

Susceptible Plants

Do not apply under circumstances where drift may occur to food, forage, or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables, or tobacco. Small amounts of pesticide drift that might not be visible may injure susceptible broadleaf plants.

Other State and Local Requirements

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D herbicides to aquatic sites. Where states have more stringent regulations, they must be observed.

Equipment

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

Aerial applications

- Apply Sculpin G at the lowest height consistent with efficacy and flight safety. <u>Do not</u> apply at a height greater than 10 feet above the water surface or plant canopy unless a greater height is required for aircraft safety.
- When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

APPLICATION INFORMATION

When to Apply:

For best results, apply Sculpin G in the spring and early summer, during the time weeds start to grow. If desired, this timing can be checked by sampling the lake bottom in areas heavily infested with weeds the year before. If treatments are delayed until weeds form a dense mat or reach the surface, two treatments or higher rates may be necessary. Make the second treatment when weeds show signs of recovery. Treatments made after September may be less effective depending upon water temperatures, region of the country, and weed growth. Occasionally, a second application will be necessary if heavy re-growth occurs or weeds re-infest from untreated areas.

How to Apply:

For Large Areas:

Use a fertilizer spreader or mechanical seeder such as the Gerber or Gandy or other equipment capable of uniformly applying this product. Before applying any chemical,

calibrate your method of application to be sure of spreading the proper amount. 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.

For Small Areas: (Around Docks or Isolated Patches of Weeds)

Use a portable spreader such as the Cyclone seeder or other equipment capable of uniformly applying this product. Estimate or measure out the area you want to treat. Weigh out the amount of material needed and spread uniformly over the area. More uniform coverage is obtained by dividing the required amount in two and covering the area twice, applying the second half at right angles to the first.

Use the following formula to calibrate your spreader's delivery in pounds of Sculpin G per minute:

Pounds per Minute = Miles per hour x spreader swath width (ft) x pounds per acre 495

Example Calculation: To apply 100 pounds of Sculpin G per acre using a spreader that covers a 20 foot swath from a boat traveling at 4 miles per hour, set the spreader to deliver 16.1 pounds of Sculpin G granules per minute:

Amounts to Use:

Rates of application vary with susceptibility of weed species to Sculpin G (refer to Table 3, *Aquatic Plant Susceptibility to Sculpin G*), density of weed mass at time of treatment, stage of growth, water depth, and rate of water exchange through the treated area. Consult with a SePRO Corporation Aquatic Specialist for site specific recommendations. Rates should be selected according to rates found in Table 4 (*Pounds of Sculpin G to Apply for Target Concentration of 2 and 4 PPM 2.4-D*).

TABLE 3	
AQUATIC PLANT SUSCEPTIBILITY	TO Sculpin G
PLANT SPECIES	Sculpin G PPM [†]
Susceptible Weeds watermilfoil (Myriophyllum spp.)	up to 1.0 to 4.0

bladde coonta water waters waters white v	To Moderately Susceptible Weeds rwort (Utricularia spp.) il†† (Ceratophyllym demersum) chestnut (Trapa natans) stargrass†† (Heteranthera dubia) hield (Brasenia spp.) vater lily (Nymphaea spp.) water lily (Nuphar spp.)	up to 2.0 to 4.0

[†] Lower concentrations may be effective under certain conditions, such as when treating larger/continuous areas or areas with less water exchange, etc.

^{††} Repeat applications may be necessary.

TABLE 4				
	POUNDS OF Sculpin G TO APPLY FOR A TARGET CONCENTRATION OF 2 AND 4 PPM 2,4-D [†]			
Surface Area Average Depth (feet) For typical conditions – 2 ppm (pounds) For difficult conditions – 4 pp (pounds)				
	1	32.7	65.4	
	2	65.4	130.9	
1 acre	3	98.2	196.3	
	4	130.9	261.8	
	5	163.6	327.2	

Use higher rates in the rate range in areas of greater water exchange, when treating more mature plants, when targeting more difficult to control aquatic species, and when treating small areas in larger bodies of water (spot treatments). Lower concentrations are generally used when: conducting early season large-scale treatments; and treating larger areas, more immature plants, and in areas with less potential for rapid water exchange. Some areas may require a repeat application to control re-growth.

NOTE: The following formula can be used to calculate applications rates based on depths exceeding 4 feet deep or when using a concentration not in the table above:

Pounds of Sculpin G per Acre = average depth x target ppm x 16.36

Example Calculation:

6 foot average depth x 2.25 ppm x 16.36 = 221 pounds of Sculpin G per acre

NOTE: apply a maximum of 65.4 pounds of Sculpin G (10.8 lbs a.e.)/acre-foot per application. Do not exceed 4.0 ppm during any single application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in original container only. Do not store near feed or foodstuffs. In case of spill, contain material and dispose as waste.

Pesticide Disposal: Wastes resulting from use of this product must be used according to label directions or disposed of at an approved waste disposal facility.

Nonrefillable Container Disposal (non-rigid, any size): Do not reuse or refill this container. Completely empty bag into application equipment. Offer for recycling if available. If recycling is not available, 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.

<u>Warranty Disclaimer</u>: SePRO Corporation warrants that this product conforms to the chemical description on the product label. Testing and research have also determined that this product is reasonably fit for the uses described on the product label. To the extent consistent with applicable law, SePRO Corporation makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty and any such warranties are expressly disclaimed.

<u>Misuse</u>: Federal law prohibits the use of this product in a manner inconsistent with its label directions. To the extent consistent with applicable law, the buyer assumes responsibility for any adverse consequences if this product is not used according to its label directions. In no case shall SePRO Corporation be liable for any losses or damages resulting from the use, handling or application of this product in a manner inconsistent with its label.

For additional important labeling information regarding SePRO Corporation's Terms and Conditions of Use, Inherent Risks of Use and Limitation of Remedies, please visit http://seprolabels.com/terms or scan the image below.



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[Editor's note: This portion of the master label contains Consumer/Homeowner Uses.]

[Sub-label B: Front label for Household/Residential container]



2,4-D GROUP 4 HERBICIDE

Sculpin® G

READY-TO-USE

A SELECTIVE HERBICIDE FOR CONTROLLING CERTAIN UNWANTED AQUATIC PLANTS

Active Ingredient

2,4-dichlorophenoxyacetic acid, dimethylamine salt	20.0%
Other Ingredients	
TOTAL	· · · · · · · · · · · · · · · · · · ·
2,4-d acid equivalence (a.e.): 16.5%	

KEEP OUT OF REACH OF CHILDREN WARNING

Specialty Chemical: Do not ship or store with food, feeds, drugs or clothing.

See back panel booklet for additional precautionary statements, directions for use and warranty information.

Net Weight []

[Editorial Note: Bracketed [text] indicates marketing claims; text in curly brackets {text} show place holders for graphics.]

Aquatic Herbicide

[Label booklet cover for Household/Residential containers]



2,4-D GROUP 4 HERBICIDE

Sculpin® G

READY-TO-USE

PRODUCT FACTS

This product will provide herbicidal control of certain unwanted aquatic plants species.

AQUATIC WEEDS CONTROLLED

Controls Various Types of Nuisance Aquatic Weeds







Milfoil

ontail L

(See complete list under the directions for use section of this label)

How Sculpin G Works

Sculpin G is applied directly to water in a pond or water front shoreline. The active ingredient, 2,4-D, is quickly absorbed by aquatic plants. Sculpin G is formulated on biodegradable granules that that when applied to water bodies immediately sink and deliver the product to the critical areas for controlling target weeds. During the growing season, typically weeds decompose in a 2 to 4 week period following treatment.

Where to Apply

Apply Sculpin G herbicide to ponds and water front shorelines.

Questions, Comme	ents or I	nformation
{graphic of phone}	Call	

Open booklet for details. Made in U.S.A.

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

EPA Reg. No. 67690-49 FPL20200616

EPA Est. No	0
[P/N] -	

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Aquatic Herbicide

[Label booklet text for Household/Residential containers]



Sculpin[®] G

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING. Causes substantial, but temporary eye injury. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Wear long-sleeved shirt and long pants, socks, shoes, and gloves.

	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.
If swallowed	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	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.
If on skin	Take off contaminated clothing.
or	• Rinse skin immediately with plenty of water for 15 - 20 minutes.
clothing	Call a poison control center or doctor for treatment advice. duet centainer or label with you when celling a paison central center or

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.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

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.

PRODUCT INFORMATION

Use Sculpin G herbicide for control of certain aquatic weeds in ponds and on water front shorelines. This product is designed to selectively control the weeds listed on this label. While certain other weeds may be suppressed, control may be incomplete. Reduced control may occur in lakes or ponds where water replacement comes from bottom springs.

Sculpin G is formulated on biodegradable granules that, when applied to water bodies, immediately deliver the herbicide down to the critical areas for controlling target weeds.

When applying Sculpin G follow all applicable use directions, precautions and limitations. All concentrations referred to in this label are based on acid equivalence (a.e.).

Resistance Management

For resistance management, Sculpin G is a Group 4 herbicide. Any weed population may contain or develop plants naturally resistant to Sculpin G and other Group 4 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Appropriate resistance management strategies should be followed.

To delay herbicide resistance, take one or more of the following steps:

- Do not use Sculpin G or other target site of action Group 4 herbicides that might have a similar target site of action, on the same weed species.
- Use tank mixtures or premixes with herbicides from different target site of action Groups as long as the involved products are all registered for the same use, have different sites of action and are both effective at the tank mix or prepack

- rate on the weed(s) of concern.
- Base use on a comprehensive Integrated Pest Management (IPM) program.
- Monitor treated weed populations for loss of field efficacy.
- Contact your local extension specialist, certified crop advisors and/or manufacturer for herbicide resistance management and/or integrated weed management measures for specific crops and resistant weed biotypes.

Use Restrictions

- There are no restrictions on fishing, swimming, recreational use, or consumption of treated water for potable use by livestock, pet, or other animals following application of Sculpin G.
- DO NOT allow people or pets to enter the treatment area while Sculpin G is being applied.
- **DO NOT** allow people or pets to enter the treated area until dusts have settled.
- DO NOT apply this product through any type of irrigation system.
- Applications to target areas are limited to two (2) per season.
- Apply a maximum of 65.4 pounds of Sculpin G (10.8 lbs a.e.)/acre-foot per application. DO NOT exceed 4.0 ppm during any single application.
- **DO NOT** apply within 21 days of previous application except when conducting split treatments. Split treatments, over relatively short periods of time (e.g., 1 to 4 days), may be effective in some areas to maintain adequate exposure with target plants, such as small sites or sites with higher dilution potential.
- **Obtain Required Permits:** Consult with appropriate state or local water authorities before applying Sculpin G. If the pond/lake is not privately owned by you be sure to check with state or local water authorities who have regulatory authority over public water as permits may be required by state or local public agencies.

APPLICATION TO WATERS USED FOR IRRIGATION Irrigation Restrictions

- **DO NOT** use treated water for irrigating greenhouse or nursery plants unless 2,4-D concentrations are confirmed to be less than 1 ppb by laboratory analysis.
- **DO NOT** use water treated with Sculpin G for hydroponic farming unless 2,4-D concentrations are confirmed to be less than 1 ppb by laboratory analysis.
- DO NOT apply Sculpin G directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable susceptible broadleaf plants, and DO NOT permit dust to drift into these areas.
- This label describes both required and recommended uses of a chemical analysis for the active ingredient 2,4-D. SePRO Corporation recommends the use of a FasTESTtfor the determination of Sculpin G concentration in water. Contact SePRO Corporation for the incorporation of this analysis into your treatment program. Other proven chemical analysis for the active ingredient may also be used. The FasTEST analysis is referenced in this label as the preferred method for the rapid determination of the concentration of the active ingredients in the water.
- If Sculpin G treated water is intended to be used only for crops or non-crop areas that are labeled for direct treatment with 2,4-D such as pastures, turf or established

- grasses, cereal grains, the treated water may be used to irrigate and/or mix sprays for these sites at any time during and after the application.
- Due to potential phytotoxicity and/or residue considerations, the following restrictions are applicable to other uses of irrigation water:
 - If treated water is intended to be used to irrigate or mix sprays for crops not labeled for direct treatment with 2,4-D, the water must not be used unless <u>one</u> of the following restrictions has been observed:
 - A setback distance described in Table 1 (*Drinking Water Setback Distances*)
 was used for the application;
 - A waiting period of 21 days from the time of application has elapsed; or
 - An approved assay indicates that the 2,4-D concentration is 100 ppb or less at the water intake. See Table 2 (Sampling for Drinking Water Analysis) for the recommended waiting periods after application but before taking the initial water sample at water intake.
 - If treated water is intended to be used to irrigate non-crop areas not labeled for direct treatment with 2,4-D (e.g., landscape ornamentals) or for other irrigation uses not described, consult with SePRO Corporation prior to commencing irrigation if 2,4-D concentrations are greater than 100 ppb.

APPLICATIONS TO POTABLE WATER SOURCES

Potable Water Restrictions

- The potable water use restrictions on this label are to ensure that consumption of water by the public is allowed only when the concentration of 2,4-D in water is less than the MCL (Maximum Contaminant Level) of 70 ppb. Applicators should consider the unique characteristics of the treated waters to assure that 2,4-D concentrations in potable water do not exceed 70 ppb at the time of consumption.
- The drinking water setback distances from functioning potable water intakes are provided in Table 1.

TABLE 1					
DRINKING WATER SETBACK DISTANCES					
Application concentration and minimum setback distance (ft) from functioning					
potable water intake					
<1 ppm [†]	1.1 to 2.0	2.1 to 3.0	3.1 to 4.0 ppm [†]		
	ppm [†]	ppm [†]			
600	1,200	1,800	2,400		

[†] ppm acid equivalent target water concentration

- Following each application of Sculpin G, treated water must not be used for potable water unless <u>one</u> of the following restrictions has been observed:
 - A setback distance described in Table 1 was used for the application;
 - o A waiting period of at least 21 days from the time of application has elapsed; or
 - An approved assay indicates that the 2,4-D concentration is 70 ppb or less at the water intake. Sampling for drinking water analysis should occur no sooner than stated in Table 2. NOTE: Analysis of 2,4-D drinking water samples must be completed by a laboratory that is certified under the Safe Drinking Water Act

to perform drinking water analysis using a currently approved version of analytical Method Number 515, 555, other methods for 2,4-D as may be listed in Title 40 CFR, Part 141.24, or Method Number 4015 (immunoassay of 2,4-D) from U.S. EPA Test Methods for Evaluating Solid Waste SW-846.

TABLE 2					
SAMPLING FOR DRINKING WATER ANALYSIS †					
Minimum days after application before initial water sampling					
at the functioning potable water intake					
≤1 ppm ^{††}	1.1 to 3.0 ppm ^{††}	3.1 to 4.0 ppm ^{††}			
5	10	14			

[†] These are general guidelines, the amount of time required for 2,4-D concentrations to reach acceptable levels for drinking or irrigation will depend on the total acres treated relative to water body size, application rates, water exchange rates, weed density, and various other factors. Consult a SePRO Corporation Aquatic Specialist for site specific recommendations.

• If no setback distance from Table 1 is to be used for the application, applicators or the authorizing organization must provide a drinking water notification and an advisory to shut off all potable water intakes inside the setback zone prior to Sculpin G application. Notification to the party responsible for a public water supply or to individual private water users must be done in a manner to assure that the party is aware of the water use restrictions when this product is applied to potable water. The following is an example of a notification via posting, but other methods of notification which convey the above restrictions may be used and may be required in some cases under state or local law or as a condition of a permit.

o Example:

- Posting notification should be located every 250 feet including the shoreline of the treated area and up to 250 feet of shoreline past the application site to include immediate public access points. Posting should include the day and time of application. Posting may be removed if analysis of a sample collected at the intake no sooner than stated in Table 2 shows that the 2,4-D concentration is 70 ppb or less, or after 21 days following application, whichever occurs first.
 - **Text of notification:** "Wait 21 days before diverting functioning surface water intakes from the treated aquatic site to use as drinking water unless water at functioning drinking water intakes is tested no sooner than [insert days from Table 2] and is demonstrated by assay to contain no more than 70 ppb 2,4-D. Application Date: _____ Time: ____."
- NOTE: Existing potable water intakes that are no longer in use, such as those replaced by a connection to a municipal water system or a potable water well, are not considered to be functioning potable water intakes.

^{††} ppm acid equivalent target water concentration

WHEN & HOW TO APPLY

- For best results, apply during sunny, dry, non-windy conditions.
- Apply directly into the water where weeds are present.
- For best results, apply in the spring and early summer, during the time weeds start to grow.
- If treatments are delayed until weeds form a dense mat or reach the surface, two treatments may be necessary. Make the second treatment when weeds show signs of recovery.
- Treatments made after September may be less effective depending upon water temperatures, region of the country, and weed growth.
- Use a portable spreader such as the Cyclone seeder or other equipment capable of uniformly applying this product. Estimate or measure out the area you want to treat. Weigh out the amount of material needed and spread uniformly over the area. More uniform coverage is obtained by dividing the required amount in two and covering the area twice, applying the second half at right angles to the first.
- Use the following formula to calibrate your spreader's delivery in pounds of Sculpin G per minute:

Pounds per Minute = Miles per hour x spreader swath width (ft) x pounds per acre 495

Example Calculation: To apply 100 pounds of Sculpin G per acre using a spreader that covers a 20 foot swath from a boat traveling at 4 miles per hour, set the spreader to deliver 16.1 pounds of Sculpin G granules per minute:

Rates of application vary with susceptibility of weed species to Sculpin G, density of
weed mass at time of treatment, stage of growth, water depth, and rate of water
exchange through the treated area. Rates should be selected according to rates
found in Table 4 (*Pounds of Sculpin G to Apply for Target Concentration of 2 and 4 PPM 2,4-D*).

TABLE 3				
AQUATIC PLANT SUSCEPTIBILITY TO Sculpin G				
PLANT SPECIES	Sculpin G ppm [†]			
Susceptible Weeds watermilfoil (Myriophyllum spp.)	up to 1.0 to 4.0			

Slightly To Moderately Susceptible Weeds	
bladderwort (<i>Utricularia</i> spp.)	
coontail++ (Ceratophyllym demersum)	
water chestnut (Trapa natans)	
water stargrass ^{††} (Heteranthera dubia)	up to 2.0 to 4.0
watershield (Brasenia spp.)	
white water lily (Nymphaea spp.)	
yellow water lily (Nuphar spp.)	
or spatterdock ^{††}	

Lower concentrations may be effective under certain conditions, such as when treating larger/continuous areas or areas with less water exchange, etc.

^{††} Repeat applications may be necessary.

TABLE 4						
POUNDS OF Sculpin G TO APPLY FOR A TARGET CONCENTRATION OF 2 AND 4 PPM 2,4-D [†]						
Surface Area	Average Depth (feet)	For typical conditions – 2 ppm	For difficult conditions – 4 ppm			
		(pounds)	(pounds)			
1 acre	1	32.7	65.4			
	2	65.4	130.9			
	3	98.2	196.3			
	4	130.9	261.8			
	5	163.6	327.2			

[†] Use higher rates in the rate range in areas of greater water exchange, when treating more mature plants, when targeting more difficult to control aquatic species, and when treating small areas in larger bodies of water (spot treatments). Lower concentrations are generally used when: conducting early season large-scale treatments; and treating larger areas, more immature plants, and in areas with less potential for rapid water exchange. Some areas may require a repeat application to control re-growth.

NOTE: The following formula can be used to calculate applications rates based on depths exceeding 5 feet deep or when using a concentration not in the table above:

Pounds of Sculpin G per Acre = average depth x target ppm x 16.36

Example Calculation:

6 foot average depth x 2.25 ppm x 16.36 = 221 pounds of Sculpin G per acre

NOTE: apply a maximum of 65.4 pounds of Sculpin G (10.8 lbs a.e.)/acre-foot per application. Do not exceed 4.0 ppm during any single application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store product in original container in a safe place. Do not store near feed or foodstuffs. In case of spill, contain material and dispose as waste.

Pesticide Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. <u>If Empty</u>: Do not reuse this container. Place in trash or offer for recycling if available. <u>If Partly Filled</u>: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Warranty Disclaimer: SePRO Corporation warrants that this product conforms to the chemical description on the product label. Testing and research have also determined that this product is reasonably fit for the uses described on the product label. To the extent consistent with applicable law, SePRO Corporation makes no other express or

implied warranty of fitness or merchantability nor any other express or implied warranty and any such warranties are expressly disclaimed.

Misuse: Federal law prohibits the use of this product in a manner inconsistent with its label directions. To the extent consistent with applicable law, the buyer assumes responsibility for any adverse consequences if this product is not used according to its label directions. In no case shall SePRO Corporation be liable for any losses or damages resulting from the use, handling or application of this product in a manner inconsistent with its label.

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[Base label for <u>Household/Residential</u> containers]



2,4-D GROUP 4 HERBICIDE

Sculpin G

READY-TO-USE

SePRO Corporation FAMILY OF PRODUCTS

Visit the SePRO website to learn more about the SePRO family of products for the best solution to your toughest pond and lakeshore aquatic weed and algae problems.

{Insert graphic – SePRO product family photo}

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Storage: Store product in original container in a safe place. Do not store near feed or foodstuffs. In case of spill, contain material and dispose as waste.

Pesticide Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. <u>If Empty</u>: Do not reuse this container. Place in trash or offer for recycling if available. <u>If Partly Filled</u>: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Aquatic Herbicide

[Text accessed through the weblink / QR code. This is NOT part of the printed label]

TERMS AND CONDITIONS OF USE

If terms of the *Warranty Disclaimer* and *Misuse* provisions on the product label as well as the *Inherent Risks of Use* and *Limitation of Remedies* statements below are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, to the extent consistent with applicable law, use by the buyer or any other user constitutes acceptance of the terms under *Warranty Disclaimer, Misuse, Inherent Risks of Use*, and *Limitation of Remedies*.

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 use under conditions noted on the label such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), the presence of other materials, the manner of application, or other factors, all of which are beyond the control of SePRO Corporation or the seller. To the extent consistent with applicable law, all such risks shall be assumed by the buyer and/or user of the product.

LIMITATION OF REMEDIES

To the extent consistent with 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:

- Refund of purchase price paid by buyer or user for product bought, or
- 2. Replacement of amount of product used.

To the extent consistent with 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. In no case shall SePRO Corporation be liable for consequential or incidental damages or losses.

The terms of the *Warranty Disclaimer* and *Misuse* provisions on the product label and these *Terms and Conditions of Use, Inherent Risks of Use* and *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* and *Misuse* provisions on the product label and these *Terms and Conditions of Use, Inherent Risks of Use* and *Limitation of Remedies* in any manner.