OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

December 15, 2023

Lei Han, PhD
Head of Regulatory Affairs
SePRO Corporation
11550 N. Meridian Street
Suite 600
Carmel, IN 46032

Subject: Label Amendment – Registration Review 679; Add container disposal language; correct typos; reformatting; revise referral statements and product self-references.
Product Name: Copper-EDA Aquatic Herbicide
EPA Registration Number: 67690-99
Application Date: 3/4/2019; 7/18/2019
Decision Number: 560898; 561012

Dear Lei Han:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 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.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Copper Compounds Interim Decision, and has concluded that your submission is acceptable.

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 12 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 FIFRA 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) lists 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 with FIFRA section 6.

If you have any questions, please contact Yasmin Bowers at 202-566-2507 or Bowers.Yasmin@epa.gov.

Sincerely,

Kable Bo Davis
Senior Regulatory Specialist
Office of Pesticide Programs
Registration Division, Immediate Office

Enclosure

[Front of label booklet, ALL containers]

COPPER	GROUP	NOT CLASSIFIED	HERBICIDE

Copper-EDA Aquatic Herbicide

Active Ingredient

Copper Ethylenediamine Complex† (CAS # 13426-91-0) 23%
Other Ingredients 77%
TOTAL 100%

†Metallic copper equivalent 8.0%
One gallon contains 0.80 pounds of elemental copper

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.)

Refer to label booklet for additional Precautionary Information and Directions for Use including First Aid and Storage and Disposal.

Notice: Read the entire label before using. Use only according to label directions. **Before buying or using this product, read *Warranty Disclaimer* and *Misuse* statements in label booklet. If terms are unacceptable, return at once, unopened.**

EPA Reg. No. 67690-99
FPL20231101

EPA Est. No. _____
[P/N]_____

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

Net contents _____ (Nonrefillable)

ACCEPTED
12/15/2023
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67690-99

[Label booklet text, ALL containers]

FIRST AID	
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 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 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.
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.
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.	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders and applicators must wear:
- Long-sleeved shirt and long pants; and
- Shoes plus socks.

USER SAFETY REQUIREMENTS

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. Discard clothing and other absorbent material that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

ENGINEERING CONTROLS

Pilots must use an enclosed cab that meets the definition listed in the WPS for agricultural

pesticides [40 CFR 170.305].

USER SAFETY RECOMMENDATIONS

- Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Fish Advisory Statement: This copper product is toxic to fish and aquatic organisms. Unlike most organic pesticides, copper is an element and will not break down in the environment and will therefore accumulate in sediment with repeated applications. Copper is a micronutrient, but its pesticidal application rate exceeds the amount of copper needed as a nutrient.

Do not use in waters containing Koi and hybrid goldfish. Not intended for use in small volume, garden pond systems. Avoid treating waters with pH values <6.5, DOC levels >3.0, and alkalinity less than 50 ppm (e.g., soft or acid waters), as trout and other sensitive species of fish may be killed under such conditions if present.

For applications in waters destined for use as drinking water, those waters must receive additional and separate potable water treatment. Do not apply more than 1.0 ppm as metallic copper in these waters.

PHYSICAL AND CHEMICAL HAZARDS

This product is not compatible with other chemicals, e.g. strong oxidizers.

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 this product. Use only according to label directions.

Do not apply this product in a way that concentrate will contact workers or other persons, either directly or thorough drift, only protected handlers may be in close proximity to the mixing area or application equipment while in use.

PRODUCT INFORMATION

This product is a chelated copper formulation that effectively controls listed species of the Hydrocharitaceae family including Hydrilla, Egeria (Brazilian Elodea), Naiads, Elodea, and Wild Celery. This product can also control Coontail, Water Lettuce, Water Hyacinth, Giant Salvinia, and Common Salvinia. If the alkalinity (hardness) of the water is low; this product may also control Myriophyllum spp. such as Eurasian Watermilfoil; and listed species of the Potamogetonaceae family such as horned pondweed, sago pondweed, American pondweed, curlyleaf pondweed, and some floating leaf pondweeds. This product may be applied to slow moving or quiescent bodies of water, including lakes, fish hatcheries, potable water reservoirs, golf courses, and ornamental fish and fire ponds, crop and non-crop irrigation conveyances (canals, laterals, and ditches).

AQUATIC USES

Waters treated with this product may be hazardous to aquatic organisms. Treatment of aquatic weeds and algae can result in oxygen loss from decomposition of dead biomass. This oxygen loss can cause fish and invertebrate suffocation. To minimize this hazard, do not treat more than ½ of the water body (excluding water infrastructure and constructed conveyances such as drainage canals, ditches and pipelines or intakes and aqueducts for drinking water or irrigation use) to avoid depletion of oxygen due to decaying vegetation. Wait at least 14 days between treatments. Begin treatment along the shore and proceed outward in bands to allow fish to move into untreated areas. Application of algaecides to high density blooms of cyanobacteria can result in the release of intracellular contents into the water. Some of these intracellular compounds are known mammalian hepato- and nervous system toxins. Therefore, to minimize the risk of toxin leakage, manage cyanobacteria effectively in order to avoid applying this product when blooms of toxin-producing cyanobacteria are present at high density. In situations where rapidly reproducing toxic algal species pose a public health threat to drinking or recreational water resources, applicators must receive authorization from applicable state, local or tribal water resources authorities to apply copper at intervals shorter than 14 days should the circumstance demand.

Certain water conditions including low pH (≤6.5), low dissolved organic carbon (DOC) levels (3.0 mg/L or lower) and “soft” waters (i.e. alkalinity less than 50 mg/L) increases the potential acute toxicity to non-target aquatic organisms. The application rates on this label are appropriate for water with pH values > 6.5, DOC levels >3.0 mg/L, and alkalinity greater than 50 mg/L. Avoid treating waters with pH values <6.5, DOC levels >3.0, and alkalinity less than 50 ppm (e.g., soft or acid waters), as trout and other sensitive species of fish may be killed under such conditions if present.

Consult your state department of natural resources or fish and game agency before applying this product to public waters. Permits may be required before treating such waters.

Pre-Treatment Considerations (All labeled sites):

Permits: Some states may require permits for the application of this product to public waters. Check with your local authorities. Water treated with this product can be used as a source of human and animal drinking water after further potable water treatment. Areas treated with this product may be used for fishing and swimming immediately after treatment.

For optimum results:

- This product should be applied early in the day under bright or sunny conditions when plants are actively growing and water temperatures are at least 60˚F (15.5˚C).
- Treat when growth first begins to appear or create a nuisance, if possible.
- Apply in a manner that will ensure even distribution of chemical within the treatment area.
- Reduced activity may occur in murky/shaded waters or where silt and/or scale has built up on plant leaf surfaces.

Treatment Notes:

For broader spectrum aquatic weed control, this product may be tank mixed with other herbicides including diquat, fluridone and endothall. Refer to “Directions for Tank Mixes” for more information. Follow all precautions and guidelines on the labels of any product(s) used with this product.

Correct placement of this product is essential in order to provide acceptable penetration into plant tissues. Apply this product when weeds are actively growing, focusing on areas where

the greatest concentration of foliage is located. Be certain to apply in such a way as to reach as much of the leafy surfaces as possible. The presence of silt or algae in the water or covering leaves can reduce the effectiveness of the application. In such cases, tank mixing this product with an algaecide, such as Cutrine® Plus (EPA Reg. No. 67690-93) may improve performance. Combined copper treatment must not exceed 1.0 ppm.

Application Methods: Equipment and methods should be used that accurately and efficiently apply product to target growth. This can include aircraft, sprayer, or spray boat equipment. Product can be applied as a subsurface injection, through weighted hoses, in an invert emulsion, or [1]mixed with a polymer, as appropriate (refer to specific instructions and use chemicals cleared for application to water and growing crops). To ensure uniform coverage of the area to be treated, this product may be applied diluted or undiluted in either a surface or subsurface application.

Effective control of treated weeds generally requires 12 to 24 hours contact time. Within 3 to 7 days following treatment, the aquatic weeds will drop below the surface of the water. This product may be re-applied in 14 days if suitable control is not achieved from the initial application. After they sink below the surface, it may take up to 6 weeks for the weeds to defoliate and decompose.

Apply only as directed on this label. Avoid contact of concentrated product with crops, ornamentals, grass or desirable plants. Injury may occur if undiluted this product or concentrations above 1.0 ppm of copper comes in contact with ornamentals, crops, grass, or other foliage.

For bodies of water containing fish treat only 1/3 to ½ of the water body at a time to avoid fish suffocation caused by oxygen depletion from decaying vegetation. To minimize this risk, wait 14 days before treating the remaining areas. Treatment should initiate along the shoreline and proceed outwards towards deeper water, to allow fish to move into untreated areas.

Algae growth in and around target plants may interfere with uptake of this product. Pretreat these areas with Cutrine Plus (EPA Reg. No. 67690-93) or other EPA registered algaecides. Do not exceed 1.0 ppm of total copper when using this product and Cutrine Plus.

Resistance Management

Apply 3.3 gallons of product per acre-foot (2.64 pounds active ingredient per acre-foot).
Do not apply more than 26.4 gallons of product per acre-foot per year (21.1 pounds active ingredient per acre-foot per year).
Do not apply more than 21.1 pounds active ingredient per acre-foot per year.
Do not make applications less than 14 days apart.

Water bodies or management units should be scouted prior to application to identify the weed species present and their growth stage to determine if the intended application will be effective. Water bodies or management units should be scouted after application to verify that the treatment was effective.

Suspected resistant weeds may be identified by these indicators:

- Failure to control a weed species normally controlled by the product at the dose applied, especially if control is achieved on adjacent weeds;

- A spreading patch of non-controlled plants of a particular weed species; and
- Surviving plants mixed with controlled individuals of the same species.

Report any incidence of non-performance of this product against a particular weed species to your retailer, or local SePRO representative at 1-800-419-7779. If resistance is suspected, treat weed escapes with an herbicide having a different mechanism of action and/or use non-chemical means to remove escapes, as practical, with the goal of preventing further reproduction.

Implement the Early Detection, Rapid Response practice and Maintenance Control by using the following practices where possible:

- Identify weeds present in a management unit through scouting or history of the water body and understand the biology of target species.
- Applications should target weeds when populations are small and there is low biomass, early in the season to maximize efficacy.
- Applications should be made so that the herbicide contacts the weed. Use the appropriate application method for the use site/weed/chemical combination.
- Weed escapes should not be allowed to go to seed or produce asexual vegetative propagules.
- Use a diversified approach toward weed management. Whenever possible incorporate multiple weed-control practices such as mechanical control, biological management practices, and rotation of MOAs.
- Time applications to have the highest probability for control and minimize need for follow-up control measures. Apply during conditions that minimize herbicide degradation (light /temperature/microbes) and/or dissipation (water exchange).

Contact your local SePRO representative, local water management agency, or extension agent to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified or your local conditions. Tank mix products so that there are multiple effective mechanisms of actions for each target weed.

APPLICATION INSTRUCTIONS

Pre-Application Dose Determination

For algae and aquatic plant treatments, applicators should conduct an initial dose determination test simulating a full-scale treatment program to determine the minimum efficacious concentrations for eliminating the target species, unless an effective dose is already known for the given target pest population.

Whole Waterbodies

Maximum annual application rate of 21.9 lbs of metallic copper per acre-foot (8 applications per year at up to 1 ppm). This rate/frequency is calculated based on staggering the treatment of each half of the water body every 14 days (at a rate of 2.74 lbs metallic copper per acre-foot = 1 ppm) for eight months (244 days). In situations where rapidly reproducing toxic algal species pose a public health threat to drinking or recreational water resources, applicators must receive authorization from applicable state, local or tribal water resources authorities to apply copper in excess of 21.9 lbs of metallic copper per acre-foot (8 applications per year at up to 1 ppm).

Partial Waterbodies
For large waterbodies such as lakes and reservoirs that support aquatic habitat, this product may be applied in multiple individual treatments to different, discreet sections of a waterbody, or water management units, within the 14-day retreatment interval, provided that the sum of those areas together constitute no more than half of the total area of the entire waterbody. Maximum annual application rate of 46.6 lbs of metallic copper per acre-foot per year (17 applications per year at up to 1 ppm). This rate/frequency is calculated based on the maximum number of possible applications allowed based on a 14-day minimum (at a rate of 2.74 lbs metallic copper per acre-foot = 1 ppm) retreatment interval for eight months (244 days). Do not apply more than 46.6 lbs of metallic copper to a water management unit, regardless of the pest(s) targeted by applications. In situations where rapidly reproducing toxic algal species pose a public health threat to drinking or recreational water resources, applicators must receive authorization from applicable state, local or tribal water resources authorities to apply copper in excess of 46.6 lbs of metallic copper per acre-foot per year for a single water management unit.

Aquaculture
Applicators must administer copper at a rate of 0.1 to 0.25 mg/L (0.34 to 0.68 lbs metallic copper/acre-foot = 0.1 to 0.25 ppm). Applicators must monitor the copper concentration and when it falls below the desired concentration, apply additional copper to bring the concentration back up to the desired concentration. Copper can be applied once daily for 5 to 11 consecutive days. Do not apply to water more than 11 days before waiting at least 14 days before retreating. Do not apply more than 46.6 lbs metallic copper per acre-foot in one year.

Catfish:
Copper can be applied throughout the spring and summer when water temperatures are consistently above 70°F when total alkalinity and hardness concentrations fall between 100 and 300 mg/L as $CaCO_3$. Applications are no longer needed in the fall after fish are harvested or the average water temperatures fall below 70°F. Apply mid-morning at a rate of 0.31 lbs metallic copper per acre-foot (0.11 ppm metallic copper). Use copper only if you plan to harvest fish before fall and anticipate problems with off-flavoring algae.

Do not make routine copper treatments for algae control in fingerling ponds or in broodfish ponds because off- flavors are not a problem in those fish. Do not use this treatment regimen in waters of low hardness and alkalinity (less than 50 ppm as $CaCO_3$) because copper may stress or kill fish.

Water molds on catfish eggs are treated inside the hatchery in a similar manner using a flow-through hatching trough. Administer a rate of 6.9 lbs metallic copper per acre-foot (2.5 ppm or mg/L based on metallic copper = 10ppm or mg/L by product) to the water of a flow-through hatching trough once daily until the embryos (eggs) develop eyes; flow rate should allow for 1 exchange every 30 minutes.

To control ich in earthen catfish ponds as a static bath treatment: Administer 0.27 to 0.69 lbs metallic copper per acre-foot (0.1 to .25 ppm or mg/L based on metallic copper = 0.4 to 1 ppm or mg/L by product) per 100 mg/L total alkalinity (as $CaCO_3$) as an indefinite exposure once daily for 5 to 11 consecutive days.

Mussels:
For treatments to whole waterbodies, administer copper at a rate of up to 1 ppm (2.74 lbs metallic copper/acre- foot) at a maximum annual rate of 21.9 lbs metallic copper per acre foot. Monitor the copper concentration and when it falls below the desired concentration,

apply additional copper to bring the concentration back up to the desired concentration. Monitor mussel populations and terminate the additional applications once mussels are dead or 14 days have passed since the initial application. Wait at least 14 days after the last application before making any additional applications.

Pulse Application Method for Algae Control in Irrigation Systems
Maximum annual application rate of 13 lbs metallic copper per year per 5 miles of conveyance per cubic foot per second (CFS). Apply copper into irrigation conveyance system or lateral at up to a maximum rate of 0.5 lbs metallic copper per cubic foot per second of water per 5 to 30-mile treatment depending on water hardness, alkalinity and algae concentration. This method may only be used in constructed irrigation conveyance systems, laterals and aqueducts.

Application Rates for Aquatic Weed Control in Quiescent or Slow Moving Water
Light to Moderate Growth is defined as a treatment area where submersed plants have not reached the water surface ("topped out" and less than 65% of the bottom or water surface in the case of floating plants) is covered with target plants. Heavy Infestations is an area where submersed vegetation growth has reached the water surface and/or bottom growth or floating plants cover more than 65% of the treatment area. **Do not apply more than 1.0 ppm copper.**

Select low range rate for light to moderate growth and upper range rate for heavy infestations.

Table 1.

Targeted Species	**Copper Level Required by Plant Density**		
In water of medium to high hardness:	**Low Density ppm Copper**	**High Density ppm Copper**	**Lbs Copper/Acre-Ft**
Hydrilla verticillata (Hydrilla)	0.75	1	2.0 – 2.64
Eichhornia crassipes (Water Hyacinth)	0.75	1	2.0 – 2.64
Pistia stratiotes (Water Lettuce)	0.75	1	2.0 – 2.64
Egeria densa (Brazilian Elodea)	0.5	0.75	1.36 – 2.0
Najas sp. (Southern/Northern Naiads)	0.5	1	1.36 – 2.64
Ceratophyllum demersum (Coontail)	0.5	1	1.36 – 2.64
Elodea canadensis (common Elodea)	0.5	1	1.36 – 2.64
The following should be treated only in water of low hardness:		**ppm Copper**	**Lbs Copper/Acre-Ft**
Myriophyllum spicatum (Eurasian Water milfoil)		0.75 - 1.0	2.0 – 2.64
Stuckenia pectinata (Sago Pondweed)		0.75 - 1.0	2.0 – 2.64
Potamogeton nodosus (American Pondweed)		0.75 - 1.0	2.0 – 2.64

Application Rate Calculation

Application Site Measurement (Lakes, Ponds, Reservoirs and Other Static or Low-Flow Waters): In lakes, reservoirs, ponds, and static canals, this label defines the application site as the location where this product is applied. Measure surface dimensions of the application site including length, width and average depth. Use the following formula to determine acre-feet:

Length (ft) X Width (ft) X Avg. Depth (ft) / 43,560 = Acre-Feet

Accurate maps and electronic devices can aid in determining area measurements and depths of treatment areas. Multiply Application Rate (from the chart below), times Acre-Feet (or surface acres for floating plants) to determine volume of this product required.

(acre-ft) X (gallons per acre-ft) = total gallons of this product required

(acre-ft) x (lbs Copper per acre-ft) = total lbs Copper required for treatment area

Table 2. Application Rates

ppm Copper Desired	Gallons per Acre-Ft	Lbs Copper per Acre-Ft
0.5	1.7	1.36
0.75	2.5	2.0
1.0	3.3	2.64

Example:
Pond dimensions: 200(ft) X 200(ft) X 4ft / 43560 = 3.67 acre-feet
To obtain 0.5 ppm of copper: (3.67 acre-ft) x (1.7gallons per acre-ft) = 6.24 gallons of this product required.

or

Pond dimensions: 200(ft) X 200(ft) X 4ft / 43560 = 3.67 acre-feet
To obtain 0.5 ppm of copper: (3.67 acre-ft) x (1.36 lbs copper per acre-ft) = 4.99 lbs Copper required for treatment area.

METHODS OF APPLICATION

1. APPLICATION USING SPRAY EQUIPMENT

Surface: In shallow areas, such as along shoreline, this product can be effectively applied using backpack units or portable tank sprayers. Dilute this product with sufficient water to evenly and efficiently treat within the intended treatment area.

[1]Use with Polymer in Application: A sinking agent, approved for water and crops, can be mixed with this product. For each surface acre to be treated, prepare a solution using the correct rate of this product with water and the sinking agent to achieve a final application mix volume of 100 to 400 gallons. Blend the sinking agent into the herbicide mix following the agent's directions for use and maintaining continuous agitation while making application. The sinking agent will assist this product in reaching and adhering to the target plants. Applications are most effective when made on dense areas of growth and when applied moving slowly in opposite direction to the water flow.
[1]Not for use in California

2. SPRAY APPLICATION BY BOAT

Surface: In shallow areas, such as along shorelines, boat-mounted tank-type power sprayers or portable water pumps equipped with appropriate dilution water and chemical intakes with calibration valves can be used to effectively apply this product through handheld spray wands or adjustable, tapered fire nozzles. Dilute this product with sufficient water to evenly and efficiently treat within the intended treatment area.

Subsurface Application: Applications in water depths of more than four feet are best made using a weighted trailing hose and applied where growth is most dense, to help assure contact with the foliage. Avoid dragging the hose through the bottom sediment.

[1]Polymer Application: If there is concern about extended contact time with the target plants, a polymer can be blended with this product or a premix of the herbicide and water. Manufacturer's directions and guidelines should be followed when using a polymer.
[1]Not for use in California

Invert Application: This product can be inverted using either tank mix or multi-fluid mixer techniques with invert oil approved for water and growing crops. For submersed plants, invert application should be made through weighted hoses dragged below the water surface. For heavy infestations, direct application is preferable. Care should be taken to prepare an invert emulsion to provide a heavy viscous consistency.

Suggested mixtures for invert application:
For Tank mix systems:
Three gallons of invert oil should be blended with 80 gallons of water and 8 gallons of this product. Bi-fluid mixer systems:
Three gallons of invert oil should be blended with 60 gallons of water and 16 gallons of this product.

3. AIRCRAFT APPLICATIONS

[1]Polymer Application: This product should be blended with a suitable polymer and applied at a rate of 20 gallons of total spray mix per surface acre. The polymer/herbicide blend must be continuously agitated during the application. Do not apply by aircraft when efficacy at depths below 4 ft are required.
[1]Not for use in California

FLOWING WATER TREATMENT

DRIP SYSTEM / METERING PUMP APPLICATION

Effective aquatic plant control in flowing water (canals, ditches, laterals, etc.) is dependent upon maintaining suitable contact time with sufficient chemical concentrations. Other factors to consider include: type of growth present, degree of infestation, water temperature and weather conditions during and following treatment.

1. Prior to treatment, it is important to accurately determine **Water Flow Rates**. In the absence of weirs, orifices or similar devices which provide accurate water flow measurements, volume of flow may be estimated via the following formula:

Average Width (ft) x Average Depth (ft) x Velocity*(ft/sec) x 0.9 = Cubic Feet per Second (CFS)

or

Water Flow Rate Gal/Min =
Average Length (ft) x Average Width (ft) x Velocity*(ft/sec) x 0.9 x 7.5 Gallons / Cubic Feet * 60 sec/min

*Velocity is the time it takes a floating object to travel a given distance. Dividing the distance traveled (ft) by the time (seconds) will yield velocity (ft/sec). Repeat measurement at least 3 times at the intended application site and use the average of these measurements.

2. Calculate volume of ditch, canal, lateral or receiving pond in cubic feet based upon water levels at the time of treatment by using the following formula:

Length (ft) x Average width (ft) x Average depth (ft) = Cubic Feet of Water

3. Calculate turnover time (the amount of time it takes for the water in the system to be replaced by new water). Convert to hours using the following formula:

$$\frac{\textbf{Canal Volume (square ft)}}{\textbf{Flow Rate (CFS)}} \div \textbf{3600} = \textbf{Turnover Time (hr)}$$

After accurately determining the water flow rate in C.F.S. or gallons/minute, find the corresponding [product name] drip rate on Table 2.

Table 3.

WATER FLOW RATE		COPPER EDA PRODUCT DRIP RATE			
CFS	Gal/min	Quarts/hour	mL/min	fl. oz./min	lbs Copper/min
1	450	0.5 - 1.0	8 - 16	0.25 - 0.5	3.2

Calculate the amount of this product needed to maintain the drip rate for a period of 3 hours by multiplying Qts/hr x 3; ml/Min. x 180; or fl. oz./Min. x 180. Dosage will maintain 1.0 ppm copper concentration in the treated water for the 3 hour period. Introduction of the chemical should be made in the channel at weirs or other turbulence-creating structures to promote the dispersion of chemical.

When this product is applied on irrigation ponds, for best control, hold water for a minimum of 3 hours before irrigating to ensure proper exposure of the targeted plants.

Pour the required amount of this product into a drum or tank equipped with a brass needle valve and constructed to maintain a constant drip rate. Use a stopwatch and appropriate measuring container to set the desired drip rate. Re-adjust accordingly if flow rate changes during the 3 hour treatment period.

Distance of control obtained down the waterway will vary depending upon density of vegetation growth. Treatment period may have to be extended up to 6 hours in areas where control may be difficult due to high flows or significant growth. Periodic maintenance treatments may be required to maintain seasonal control.

NOTE: Use higher dosage range in cooler water (60°F - 70°F), under conditions of heavy growth and/or on matured plant growth. Lower dosage ranges may be used on

maintenance control treatments, young plants and/or under minimal growth conditions in warmer waters (>70°F).

To calculate the total amount of this product required to maintain the drip rate in flowing water:

Based on the Water Flow Rates calculated in Step 1, select the Product Drip Rate from Table 3 and the Turnover Time calculated from Step 2, calculate the amount of product needed for water volume in treatment area.

This Product Required (qts) = Dosage Rate (qt/CFS/hr) x Flow Rate (CFS) x Turnover Time (hr)

NOTE: Turnover Time is used for this calculation for total product needed by volume to be treated as it represents the time it takes for water to be replaced with new in the system. If turnover time is less than 3 hrs. substitute 3 hrs. into this calculation as this is the required contact/exposure time for efficacy.

4. For ditches, canals and laterals determine the number of drip/metering application sites required (based upon turnover time) by referring to the chart below:

Table 4. TURNOVER TIME (Hrs) NUMBER OF DRIP/METERING SITES	
Less than 4.5	1
4.6-7.5	2
7.6-10.5	3
10.6-13.5	4
13.6-16.5	5

Sites where water is stored for a calculated retention time and are fed by a single input source will require a single dripper/metering system. Inflowing water should be treated at the appropriate dosage rate from Table 2 for the duration of the entire turnover time calculated in Section 3.

5. Calculate distance between drip/metering sites by using the following formula:

$$\frac{\textbf{Canal or Ditch or Lateral Length (ft)}}{\textbf{No. of Drip or Metering Sites}} = \textbf{Distance Between Drip or Meetering Systems (ft)}$$

6. Calculate amount of this product required per drip/metering site by using the following formula:

$$\frac{\textbf{Total This Product Required (qts)}}{\textbf{No. of Drip or Meetering Sites}} = \textbf{Product Required per Drip Meetering Site (qts)}$$

7. Calculate drip/metering duration per site by using the following formula:

$$\frac{\textbf{This Product Required Per Site (qts)}}{\textbf{Dosage Rate (qt per CFS per hr)} \times \textbf{Flow Rate (CFS)}} = \textbf{Drip Meetering Duration (hr)Per Site}$$

8. Calculate Drip/Metering Rate by using the following formula to convert to oz./min or ml/min.

Flow Rate (CFS) x Drip Rate (qt/CFS/hr) x 0.533* = Drip Rate (oz/min.)

NOTE: 0.533 is a constant used to convert qt/hr to oz/min

METRIC CONVERSION: Drip Rate (fl. oz/min) x 29.57 = Drip Rate (mL/min)

Calibrate drip system, metering pump or similar dosage device to establish output rate determined in Step No. 8. This can be done using a watch with a second hand and a calibrated measuring cup, graduated cylinder or similar vessel.

If possible, calibrate all drip/metering devices prior to beginning actual treatment. Turn them on as simultaneously as possible, beginning with the device furthest upstream.

Begin with only the amount of product required at each site or record your start-up time and shut down drip/metering systems after the drip/metering duration time period determined in Step No. 7.

Results can vary depending upon plant species, density of vegetation, desired distance of control and flow rate, and impact of water quality on copper residues and efficacy. Consult with Applied Biochemists to determine optimal use rate and treatment period under local conditions. Retreatments may be required to maintain seasonal control.

DIRECTIONS FOR TANK MIXES

Always refer to all product labels that will be used in the tank mix solution. Follow the mixing directions, product precautions and directions for use recommendations for each product. Do not mix this product with any other product if the label prohibits such mixtures. When using tank mixes, do not exceed the application rate of the product that is most restrictive. All mix example directions given below are calculated for application at rate of 20 gallons per surface acre. When algae is on or near target plants it may interfere with effectiveness of the treatment. Pretreat the algae in the affected area prior to conducting an herbicide tank mix. Pre-treatment with Cutrine Plus (Reg. No. 67690-93) may improve control. If products are chemically compatible they may be tank mixed. Do not exceed 1.0 ppm copper when using this product and Cutrine Plus, or any copper-based pesticide. Follow the most restrictive of the labeling limitations and precautions of all products used in mixtures.

This product + Endothall (EPA Reg. No. 70506-176). Application can be made via surface spray or subsurface methods.

Species Treated:
Listed species of the Potamogetonaceae (Pondweeds) family, Hydrocharitaceae family, Pontaderiaceae (Waterhyacinth) family, Araceae (Water Lettuce) family, Lemnaceae family (Duckweed spp.), Haloragaceae family (Milfoils), Coontail, Giant Salvinia, Common Salvinia, Pennywort, Bladderwort, and Cattails.

MIX RATIOS: (Based on application rate of 20 gallons of tank mix per surface acre).

Water	100 gallons
This product	20 gallons
Endothall	15 gallons

This product + diquat dibromide (EPA No. 67690-53). Helicopter applications may be done using mixes of 37.3% diquat and this product. Application can be made via surface spray or subsurface methods.

Species Treated:
Listed species of the Potamogetonaceae (Pondweeds) family, Hydrocharitaceae family, Pontaderiaceae (Waterhyacinth) family, Araceae (Water Lettuce) family, Lemnaceae family (Duckweed spp.), Haloragaceae family (Milfoils), Coontail, Giant Salvinia, Common Salvinia, Pennywort, Bladderwort, and Cattails.

MIX RATIOS: (Based on application rate of 20 gallons of tank mix per surface acre).

Water	100 gallons
This product	20 gallons
Diquat dibromide	10 gallons
Cutrine Plus (Aquatic Algaecide)	2 gallons

Spray Drift Management

Aerial Applications

- Do not release spray at a height greater than 10 ft above the vegetative canopy or water, unless a greater application height is necessary for pilot safety.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.1).
- Do not apply when wind speed exceeds 15 mph at the application site. If the windspeed is greater than 10 mph, the boom length must be 65% or less of the wingspan for fixed wing aircraft and 75% or less of the rotor diameter for helicopters. Otherwise, the boom length must be 75% or less of the wingspan for fixed-wing aircraft and 90% or less of the rotor diameter for helicopters.
- Applicators must use ½ swath displacement upwind at the downwind edge of the application area.
- Do not apply during temperature inversions.

Ground Boom Applications

- Apply with the spray release height recommended by the manufacturer, but no more than 4 feet above the water surface.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.1).
- Do not apply when wind speeds exceed 15 miles per hour at the application site.
- Do not apply during temperature inversions.

Spray Drift Advisories

The applicator is responsible for avoiding off-site spray drift. Be aware of nearby non-target sites and environmental conditions.

Importance of Droplet Size

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size – Ground Boom

- Volume - Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.

- Pressure - Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.
- Spray Nozzle - Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

Controlling Droplet Size – Aircraft

- Adjust Nozzles - Follow nozzle manufacturers recommendations for setting up nozzles. Generally, to reduce fine droplets, nozzles should be oriented parallel with the airflow in flight.

Boom Height – Ground Boom

Use the lowest boom height that is compatible with the spray nozzles that will provide uniform coverage. For ground equipment, the boom should remain level with the crop and have minimal bounce.

Release Height - Aircraft

Higher release heights increase the potential for spray drift. When applying aerially to crops, do not release spray at a height greater than 10 ft above the crop canopy, unless a greater application height is necessary for pilot safety.

Shielded Sprayers

Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

Temperature and Humidity

When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

Temperature Inversions

Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

Wind

Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS.

Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool dry place. Do not store near feed or foodstuffs. In case of leak or spill, use absorbent materials to contain liquids and dispose in a manner consistent with the pesticide disposal instructions.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling

Nonrefillable Container. DO NOT reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤5gallons) as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Triple rinse container too large to shake (capacity >5 gallons) as follows: Nonrefillable container. Do not reuse or refill container. Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available or puncture and dispose of in approved landfill. Consult Federal, State, or local authorities for approved alternative procedures.

Pressure rinse (bulk or tote) container as follows: Nonrefillable container. Do not reuse or refill container. Clean container promptly after emptying the contents from this container into application equipment or mix tank and before the final disposal using the following pressure rinsing procedure. Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top, bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure, spray duration and/or spray volume. If the manufacturer's instructions are not available, pressure rinse the container for at least 60 seconds using minimum pressure of 30PSI with a minimum rinse volume of 10% of the container volume. Drain, pour or pump rinsate into application equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Then, for Plastic Containers, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. For Metal containers, offer for recycling, if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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.

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.

[Base label for ALL containers]

COPPER	GROUP	NOT CLASSIFIED	HERBICIDE

Copper-EDA Aquatic Herbicide

Active Ingredient
Copper Ethylenediamine Complex† (CAS#'s 13426-91-0) 23%
Other Ingredients 77%
TOTAL 100%
†Metallic copper equivalent, 8.0%
One gallon contains 0.80 pounds of elemental copper.

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.)

Refer to label booklet for additional Precautionary Information and Directions for Use including First Aid and Storage and Disposal.

Notice: Read the entire label before using. Use only according to label directions. **Before buying or using this product, read *Warranty Disclaimer and Misuse statements in label booklet. If terms are unacceptable, return at once, unopened.***

FIRST AID	
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 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 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.
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.
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.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. 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.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders and applicators must wear:

- Long-sleeved shirt and long pants; and
- Shoes plus socks.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool dry place. Do not store near feed or foodstuffs. In case of leak or spill, use absorbent materials to contain liquids and dispose in a manner consistent with the pesticide disposal instructions.

Pesticide Disposal: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Handling

Nonrefillable Container. DO NOT reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying; then offer for recycling, if available, or reconditioning, if appropriate, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

Triple rinse containers small enough to shake (capacity ≤5gallons) as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Triple rinse container too large to shake (capacity >5 gallons) as follows: Nonrefillable container. Do not reuse or refill container. Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank, or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning if available or puncture

and dispose of in approved landfill. Consult Federal, State, or local authorities for approved alternative procedures.

Pressure rinse (bulk or tote) container as follows: Nonrefillable container. Do not reuse or refill container. Clean container promptly after emptying the contents from this container into application equipment or mix tank and before the final disposal using the following pressure rinsing procedure. Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top, bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure, spray duration and/or spray volume. If the manufacturer's instructions are not available, pressure rinse the container for at least 60 seconds using minimum pressure of 30PSI with a minimum rinse volume of 10% of the container volume. Drain, pour or pump rinsate into application equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Then, for Plastic Containers, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by other procedures approved by state or local authorities. For Metal containers, offer for recycling, if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

See attached booklet for complete container handling directions including triple rinsing and pressure rinsing instructions.

EPA Reg. No. 67690-99
FPL20231101

EPA Est. No. _____
[P/N]_____

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

Net contents _____ (Non-refillable)

[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:

1. 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.