

79676-16

07/18/2005

1/21

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 79676-16	2. EPA Product Manager J. Tompkins	3. Proposed Classification ☒ None ☐ Restricted
4. Company/Product (Name) Gro-Pro LLC / SFM G-Pro 75 EG Herbicide	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Gro-Pro LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 ☐ Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

☐ Amendment - Explain below.	☐ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____	☐ "Me Too" Application.
☒ Notification - Explain below.	☐ Other - Explain below.

NOTIFICATION**JUL 18 2005****Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label changes per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

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

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) 253-853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 6/30/05			

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NOTIFICATION

JUL 18 2005

SFM G-Pro 75 EG Herbicide

Dispersible Granules

For Control of Broadleaf Weeds and Annual Grasses in Forestry and Non-Crop Sites

ACTIVE INGREDIENT:

Sulfometuron methyl:

{Methyl 2-[[[(4,6-dimethyl-2-pyrimidinyl)amino]-carbonyl]amino]sulfonyl]benzoate} 75.0%

OTHER INGREDIENTS: 25.0%**TOTAL:** 100.0%**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	

See inside label booklet for additional PRECAUTIONARY STATEMENTS

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 79676-16

EPA Est. No.

Manufactured for:
Gro-Pro LLC
2214 Hwy 44 West
Inverness, FL 34453

SFM G-PRO 75 EG HERBICIDE
contains sulfometuron, the active
ingredient used in Oust®.

Net Weight:

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes and socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables are available, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control Statement: When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately, if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning of equipment or disposing of equipment washwaters or rinsate.

GENERAL INFORMATION

SFM G-PRO 75 EG HERBICIDE is a dispersible granule used to control broadleaf weeds and many annual and perennial grasses in forestry and noncrop sites. This product can be used for general weed control on terrestrial noncrop sites and for selective weed control in certain types of unimproved turf grasses on such sites. This product can also be used for selective weed control in forest site preparation and in the release of several types of pines and certain hardwoods.

SFM G-PRO 75 EG HERBICIDE may also be used on forestry and noncrop sites that are temporarily inundated, such as between planting beds, in equipment ruts, or in other depressions created by management activities. It is permissible to treat intermittent drainage, intermittently flooded low lying sites, seasonal dry flood plains and transitional areas between upland and lowland sites when no water is present. Marshes, swamps, bogs and seasonally dry flooded deltas may also be treated, but ONLY after all water has receded. DO NOT make applications to natural or man-made bodies of water such as lakes, reservoirs, ponds, streams and canals.

SFM G-PRO 75 EG HERBICIDE provides both preemergence and postemergence weed control. Preemergence treatments control or suppress weeds through root uptake. For best results, make applications before or during the early stages of weed growth (before weeds develop an established root system) with adequate moisture to ensure uptake through the roots.

Postemergence control works through root and foliar uptake when SFM G-PRO 75 EG HERBICIDE is applied directly to young, actively growing weeds. The application rate will depend on the weed species, weed size at application and soil texture.

In general, use lower rates on smaller weeds and on coarse-textured soils and use higher rates on established plants and on fine-textured soils.

SFM G-PRO 75 EG HERBICIDE is nonvolatile, noncorrosive, nonflammable and will not freeze.

BIOLOGICAL ACTIVITY

SFM G-PRO 75 EG HERBICIDE rapidly inhibits growth of susceptible weeds when absorbed by both the roots and foliage of plants. Two to three weeks following application, leaf growth slows and growing points will turn reddish-purple. Within 4 to 6 weeks of application, leaf veins and leaves become discolored and growing points die.

ENVIRONMENTAL CONDITIONS

SFM G-PRO 75 EG HERBICIDE performs best when warm, moist conditions following application, whereas cold and dry conditions will delay herbicidal activity. Weeds hardened-off by drought stress are less susceptible to applications of SFM G-PRO 75 EG HERBICIDE.

For *preemergence* control, moisture is required to move the product into the root zone of weeds. Without sufficient rainfall or other source of moisture, SFM G-PRO 75 EG HERBICIDE may not provide satisfactory results. However, *postemergence* weed control may be diminished if rainfall occurs too soon following application.

Short and long-term efficacy will depend on the following:

- Soil pH, soil moisture and the amount of organic matter present in the soil.
- The diversity of weeds present as well as the magnitude of infestation.
- Weed size at the time of application.
- Environmental conditions during and following treatment.

WEED RESISTANCE TO HERBICIDES

When herbicides with the same mode of action are used repeatedly over several years to control the same weed species in the same field, naturally-occurring resistant weed biotypes may survive a correctly applied herbicide treatment, propagate, and become dominant in that field. Once developed, these resistant weed biotypes may not be adequately controlled using the same products and procedures that previously provided control. Cultural practices such as tillage, preventing weed escapes from going to seed, and using herbicides with different modes of action within and between crop seasons can aid in delaying the proliferation and possible dominance of herbicide resistant weed biotypes.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Gro-Pro LLC will not be responsible for losses or damages resulting from the use of this product in any manner not specifically recommended by Gro-Pro LLC. User assumes all risks associated with such non-recommended use.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made out of any waterproof material
- Shoes and socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protections Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not enter or allow others to enter the treated area until sprays have dried.

Selective non-crop industrial weed control in turf (industrial, unimproved only) are not within the scope of the Worker Protection Standard.

IMPORTANT PRECAUTIONS

IN COLORADO, DO NOT USE THIS PRODUCT IN THE FOLLOWING COUNTIES: Saguache, Rio Grande, Alamosa, Costilla and Conejos.

Do not apply more than 8 ounces of product per acre per year.

Failing to follow the following precautions may result in injury to, or loss of, desirable trees or plants:

- Do not apply SFM G-PRO 75 EG HERBICIDE on feed or food crops.
- Low rates of SFM G-PRO 75 EG HERBICIDE can kill or severely injure most crops. Mixing and application equipment used to apply SFM G-PRO 75 EG HERBICIDE must be used for forestry and noncrop applications only; do not use sprayer for application to agricultural or ornamental crops following a SFM G-PRO 75 EG HERBICIDE application. Do not drain or flush equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
- Treatment of powdery, dry soil or light, sandy soil when there is little likelihood of rainfall soon after treatment may result in off-target movement and possible damage to susceptible crops when soil particles are moved by wind or water. Do not treat powdery, dry soil or light sandy soils where there is little likelihood of rainfall after treatment. Injury to crops may result if treated soil is washed, blown, or moved onto land used to produce crops. Exposure to SFM G-PRO 75 EG HERBICIDE may injure or kill most crops. Injury may be more severe when the crops are irrigated.
- Avoid applications where runoff water flows onto agricultural land or crop injury may occur.

- Applications made during periods of intense rainfall, to soils saturated with water, surfaces paved with materials such as asphalt or concrete, or soils through which rainfall will not readily penetrate may result in runoff and movement of SFM G-PRO 75 EG HERBICIDE and should be avoided.
- To reduce the potential for SFM G-PRO 75 EG HERBICIDE movement by soil erosion due to wind or water, treated soil should be left undisturbed.
- Do not treat frozen soil.
- Do not use on lawns, walks, driveways, tennis courts, or similar areas.
- Do not apply in or on irrigation ditches or canals, including their outer banks.
- Keep from contact with fertilizers, insecticides, fungicides, and seeds.
- Do not apply this product through any type of irrigation system.
- Do not plant treated sites for at least one year following SFM G-PRO 75 EG HERBICIDE application if noncrop or forested sites treated with SFM G-PRO 75 EG HERBICIDE are to be converted to a food, feed, or fiber agricultural crop, or to a horticultural crop.
- To avoid damage to crops planted in areas that have been treated with SFM G-PRO 75 EG HERBICIDE, and to ensure complete dissipation of this product in treated sites, soil samples should be quantitatively analyzed and a bioassay should be conducted before planting. To conduct a field bioassay, grow to maturity test strips of the crop(s) you intend to plant the following year. The test strips should cross the entire field and include both high and low-lying areas. Crop response to the bioassay will indicate if it is safe to plant the desired crop(s).

GUIDELINES FOR BROADCAST APPLICATIONS

Ground

- Select a spray volume and delivery system that ensures thorough coverage and a uniform spray pattern.
- Calibrate sprayer before use.
- Apply SFM G-PRO 75 EG HERBICIDE in 10 to 40 gallons of water per acre.
- In order to minimize injury to desired species, avoid overlapping and shut off spray booms while starting, turning or slowing.

Air (Helicopter Only)

- *Do not use fixed-wing aircraft.*
- Select a spray volume and delivery system that ensures thorough coverage and a uniform spray pattern.
- Calibrate sprayer before use.
- Apply SFM G-PRO 75 EG HERBICIDE in 5 to 15 gallons of water per acre.
- In order to minimize injury to desired species, avoid overlapping and shut off spray booms while starting, turning or slowing.
- When applying SFM G-PRO 75 EG HERBICIDE, a drift control agent may be used at the manufacturer's recommended rate.

MIXING INSTRUCTIONS

1. Fill spray tank $\frac{1}{2}$ full of water.

2. With agitator running, add proper amount of SFM G-PRO 75 EG HERBICIDE as indicated in the appropriate section of this label.
3. If using a companion product, add the label recommended amount.
4. For postemergent applications, add the proper amount of spray adjuvants (i.e., surfactants, drift control agents, etc.). NOTE: Be sure to read the cautions regarding surfactants in the use-specific sections of this label below.
5. Add the remaining water.
6. Agitate spray tank thoroughly.

SFM G-PRO 75 EG HERBICIDE spray preparations are stable if they are pH neutral or alkaline and stored at or below 100°F. If spray preparation is left standing for any period of time, agitate thoroughly before using.

SPRAY DRIFT MANAGEMENT

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

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR.

Importance of Droplet Size

The most effective way to reduce drift potential is to apply large droplets (>150-200 microns). The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage.

Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (See Wind, Temperature and Humidity, and Temperature Inversions sections of this label).

Controlling Droplet Size – General Techniques

- Volume – Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure – Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. **WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.**
- Nozzle Type – Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles.

Controlling Droplet Size – Aircraft

- Number of Nozzles – Use the minimum number of nozzles with the highest flow rate that provide uniform coverage.
- Nozzle Orientation – Orienting nozzles so that the spray is emitted backwards, parallel to the airstream will produce larger droplets than other orientations.
- Nozzle Type – Solid stream nozzles (such as disc and core with swirl plate removed) oriented straight back produce larger droplets than other nozzle types.

Boom Length and Height

- Boom Length (aircraft) – For helicopters use a boom length and position that prevents droplets from entering the rotor vortices.
- Boom Height (aircraft) – Application more than 10 ft. above the canopy increases the potential for spray drift.

- **Boom Height (ground)** – Setting the boom at the lowest labeled height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. The boom should remain level with the crop and have minimal bounce.

Wind

Drift potential increases at wind speeds of less than 3 mph (due to variable direction and inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. **AVOID GUSTY OR WINDLESS CONDITIONS.**

Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity

When making applications in hot and dry conditions, set up equipment to produce larger droplets to compensate for evaporation.

Surface Temperature Inversions

Drift potential is high during a surface temperature inversion. Surface inversions restrict vertical air mixing, which causes small-suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Surface inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified 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.

Shielded Sprayers

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

SPRAYER CLEANUP

Following the application of SFM G-PRO 75 EG HERBICIDE, thoroughly clean all mixing and spray equipment as follows:

1. Drain tank and thoroughly rinse spray tanks, boom, and hoses with clean water.
2. Fill tank with clean water and 1 gallon of household ammonia (containing 3% active) for every 100 gallons water. Flush the hoses, boom, and nozzles with the cleaning solution. Add more water to completely fill the tank. Circulate the cleaning solution through the tank and hoses for at least 15 minutes. Flush the hoses, boom, and nozzles again with the cleaning solution then drain the tank.

Note: Equivalent amounts of an alternate-strength ammonia solution or a commercial cleaner can be used in the cleanout procedure. If a commercial cleaner is used, carefully read and follow the individual cleaner instructions.

3. Remove the nozzles and screens and clean separately in a bucket containing cleaning agent and water.
4. Repeat step 2.
5. Rinse the tank, boom, and hoses with clean water.

6. Dispose of the rinsate on a labeled site or at an approved waste disposal facility. If a commercial cleaner is used, follow the directions for rinsate disposal on the label.

NOTES:

1. When SFM G-PRO 75 EG HERBICIDE is tank mixed with other products, the required cleanout procedures for each product in the mix should be examined and the most rigorous procedure followed.
2. Do not clean equipment in an enclosed area.
3. Do not use chlorine bleach with ammonia as dangerous gases will form.
4. To facilitate the removal of any caked-on deposits, it is recommended that aerial spray tanks be steam-cleaned before performing the cleanout procedure described above.

AGRICULTURAL USES

FORESTRY USES

IMPORTANT PRECAUTIONS – FORESTRY ONLY

- Applications of SFM G-PRO 75 EG HERBICIDE made to trees that are suffering from loss of vigor caused by insects, diseases, drought, winter damage, animal damage, excessive soil moisture, planting shock, or other stresses may injure or kill the trees.
- Make applications of SFM G-PRO 75 EG HERBICIDE made for release (trees present) after adequate rainfall has closed the planting slit and settled the soil around the roots following transplanting.
- Do not apply SFM G-PRO 75 EG HERBICIDE to conifers or hardwoods grown for Christmas trees or ornamentals.
- If a surfactant is used with SFM G-PRO 75 EG HERBICIDE, allowing the spray to contact tree foliage may injure or kill the trees. *The user assumes all responsibility for tree injury if a surfactant is used with SFM G-PRO 75 EG HERBICIDE treatments applied after planting.*
- Applications of SFM G-PRO 75 EG HERBICIDE can result in damage and mortality to other species of trees not listed in this label that are present on sites with those listed in the following recommendations for forestry uses.
- Use on hardwood trees growing in soils having a pH of 7 or greater may injure or kill the trees.
- Careful consideration must be given by an experienced and knowledgeable forester to match the requirements of the hardwood tree species to the conditions of the site. Treatment of species mismatched to the site may injure or kill the trees.
- Do not use SFM G-PRO 75 EG HERBICIDE on poorly drained or marshy sites. SFM G-PRO 75 EG HERBICIDE can be used where plantings are on raised beds.
- When applying by helicopter, do not apply within 200 feet of any homestead or nontarget plantings.

Application Information

SFM G-PRO 75 EG HERBICIDE will control many broadleaf weeds and grasses in forestry sites. Apply by ground equipment or by air (helicopter only).

Application Timing

Apply SFM G-PRO 75 EG HERBICIDE before herbaceous weeds emerge or shortly thereafter. Apply only during seasons when rainfall is sufficient to activate the herbicide in the soil; see the Environmental Conditions section above for more information regarding soil moisture requirements.

Weeds Controlled

SFM G-PRO 75 EG HERBICIDE effectively controls the following weeds when applied at the indicated use rates for the respective species:

Chickweed	Nutsedge (yellow)
Crabgrass	Panicum (broadleaf, fall, narrow)
Dogfennel	Pokeweed
Fescue	Ragweed
Fireweed (willowweed)	Shepherd's purse
Goldenrod	White snakeroot
Horseweed	Yellow sweetclover
Kentucky bluegrass	

Also refer to the weeds controlled under the Application Information-Noncrop Sites section of this label.

Application Rates

Apply SFM G-PRO 75 EG HERBICIDE at the rates indicated by the use site and region descriptions below. Use lower rates on coarse-textured soils (i.e., loamy sands, sandy loams) and higher rates on fine-textured soils (i.e., sandy clay loams and silty clay loams).

CONIFERS**CONIFER SITE PREPARATION****Application Before Transplanting**

To control herbaceous weeds, make all applications before transplanting.

Southeast –

Apply 2 to 8 oz. per acre for loblolly, longleaf, slash, and Virginia pine. Pines may be transplanted in treated areas in the planting season following application.

Northeast and Lake States –

For black spruce, apply 2 to 4 oz. per acre. Transplant at least 13 months after treatment.

For red pine, apply 1 to 2 oz. per acre. Transplant the following spring or summer but not less than 3 months after application. Areas receiving ½ to 1 oz. per acre may be transplanted a minimum of 30 days following application.

For larch and tamarack, apply 2½ to 4 oz. SFM G-PRO 75 EG HERBICIDE plus glyphosate (as registered). Transplant the following spring or summer but not less than 8 months after treatment.

West –

For coastal redwood, Douglas fir, grand fir, hemlock, lodgepole pine, ponderosa pine, western larch, western white pine and white fir, apply 2 to 4 oz. per acre. Where western red cedar is a primary species, apply 2 to 3 oz. per acre, as higher rates may cause unacceptable injury.

For ponderosa pine in California and other arid areas, apply in the fall and transplant the following spring.

Other conifer species may be planted; however, Gro-Pro LLC has not tested the response of unlisted conifer species and therefore does not assume responsibility for any injury that may occur to species not listed above.

CONIFER RELEASE**Application After Transplanting**

Apply SFM G-PRO 75 EG HERBICIDE after transplanting to control herbaceous weeds.

Southeast –

For loblolly, longleaf, slash or Virginia pine apply 2 to 8 oz. per acre. For eastern white pine, apply 1 to 1 ½ oz. per acre.

Tank Mix Combinations (Southeast Only) – For control of a broader spectrum of weeds in stands of loblolly, longleaf, or slash pine, apply 2 to 4 oz. of SFM G-PRO 75 EG HERBICIDE plus 2 to 3 pts. of DuPont Velpar® L Herbicide or 2/3 to 1 lb. of DuPont Velpar® DF Herbicide. NOTE: These tank mixes may injure or kill trees when applied during high humidity and temperature.

For enhanced control of bermudagrass and johnsongrass in stands of loblolly pine, apply 2 oz. of SFM G-PRO 75 EG HERBICIDE plus 4 to 6 fl. oz. of Arsenal® Applicators Concentrate. Make the application during late winter through spring when weeds first emerge. NOTE: Arsenal® may temporarily inhibit pine growth if it is applied when pine is actively growing.

For control of many annual weeds (particularly on cropland conversion areas), apply 2 to 4 oz. of SFM G-PRO 75 EG HERBICIDE plus 4 to 8 pts. of Aatrex® 4L per acre. Use higher rates on medium to fine textured soils where organic matter exceeds 2%. NOTE: Use only on tree species specifically listed in both this label and the Aatrex® 4L label.

Northeast and Lake States –

For jack or Virginia pine, apply 2 to 8 oz. of SFM G-PRO 75 EG HERBICIDE. For eastern white pine, apply 1 to 1 ½ oz. per acre.

For white spruce, apply 1 ½ to 3 oz. per acre. Apply ½ to 2 oz. per acre for red pine not less than 1 year following transplanting. NOTE: Be sure to make applications when trees are dormant as applications at budbreak and later stages of active growth may severely injure or kill trees.

West –

For coastal redwood, Douglas fir, grand fir, hemlock, lodgepole pine, ponderosa pine, western larch, or western white pine, apply 2 to 4 oz. per acre. Where western red cedar is a primary species, apply 2 to 3 oz. per acre as higher rates may cause unacceptable injury.

For ponderosa pine in California and other arid areas, apply SFM G-PRO 75 EG HERBICIDE over dormant seedlings in the spring following fall planting or in the fall over dormant trees following spring planting. NOTE: Trees may be severely injured or killed if applications are made after dormancy break in the spring and before the final resting bud has hardened in the fall.

Application can be made for the release of other conifer species present at the site; however, Gro-Pro LLC has not tested the response of unlisted conifer species and therefore, does not assume responsibility for any injury that may occur to species not listed above.

HARDWOODS**General Use Guidelines for Hardwoods**

- The product should be tested on a small area in order to determine the selectivity of SFM G-PRO 75 EG HERBICIDE on specific clones.
- SFM G-PRO 75 EG HERBICIDE must be activated by rainfall or overhead irrigation before weeds become well established.
- Apply when the trees are dormant and avoid contact of the spray with green buds or tissue as injury to the trees may result. Avoid applications during the period when trees are actively growing; from bud-swell in the spring to leaf drop in the fall.
- Use of SFM G-PRO 75 EG HERBICIDE may cause temporary chlorosis (yellowing) or a small reduction in tree height during the year of use.

HARDWOOD SITE PREPARATION

Application Before Transplanting

Where northern red oak, white oak, chestnut oak, American sycamore, ash (white or green), red maple, sweetgum, or yellow poplar are to be planted, apply 3 to 5 oz. of SFM G-PRO 75 EG HERBICIDE.

West –

For hybrid poplar west of the Cascade Mountains, apply $\frac{1}{2}$ to $1\frac{1}{4}$ oz. per acre for heavy weed infestations and where maximum residual control is desired. Use $\frac{1}{2}$ to $\frac{3}{4}$ oz. per acre for light weed infestations or where small diameter cuttings are to be planted. Allow a minimum of 3 days between application and planting.

HARDWOOD RELEASE

Application After Transplanting

In stands of American sycamore, ash (white or green), bald cypress, oaks (such as chestnut, northern red, southern red, overcup, pin, swamp chestnut, cherrybark, water, white, etc.), red maple, sweetgum, or yellow poplar, apply 1 to 4 oz. per acre of SFM G-PRO 75 EG HERBICIDE.

NOTE: Applications must be made before the hardwood tree seedlings or transplants break dormancy (bud swell stage). Applications made over the top after the trees have broken dormancy may injure or kill the trees.

West –

For hybrid poplar west of the Cascade Mountains, apply $\frac{1}{2}$ to $1\frac{1}{4}$ oz. per acre for heavy weed infestations and where maximum residual control is desired. Use 0.5 to 0.75 oz. per acre for light weed infestations or when small diameter cuttings have been planted. Apply only to trees which have been established for a minimum of 1 year.

Lake States –

For hybrid poplar in the Lake States, apply at the rate of 1 to 2 oz. per acre in the fall or early winter. When late winter or early spring applications are made use 1 oz. per acre. Apply only to trees which have been established for a minimum of 1 year.

NATURAL HARDWOOD REGENERATION

Use SFM G-PRO 75 EG HERBICIDE for herbaceous weed control in commercial reforestation areas where hardwood seedling regeneration is desired following shelterwood seed cuts. Apply 2 to 5 oz. per acre using appropriate ground equipment.

For control of striped maple and beech, tank mix with 1 to 2 qts. per acre of glyphosate. For best results, apply from late summer to mid-fall. *Note that hardwood seedlings present at the time of application may be severely injured or killed.*

NON-AGRICULTURAL USES

NONCROP SITES

SFM G-PRO 75 EG HERBICIDE may be used for general weed control on private, public and military noncrop sites such as:

- Uncultivated Nonagricultural Areas (such as airports, roadsides, highways, railroad and utility rights-of-way, sewage disposal areas, etc.)
- Uncultivated Agricultural Noncrop Areas (such as farmyards, fuel storage areas, fence rows, areas enrolled in Conservation Reserve Programs (CRP), soil bank land, barrier strips, etc.)

- Outdoor Industrial Sites (such as lumberyards, petroleum tank farms, pipelines, pumping installations, storage areas, plant sites, etc.)
- SFM G-PRO 75 EG HERBICIDE is not recommended for use on recreation areas or for direct application to paved areas (surfaces)

Application Information

Make applications with ground or aerial equipment (helicopter only). If applied by helicopter, do not apply within 200 feet of any homestead, agricultural land or other desirable plantings.

Combination with other herbicides broadens the spectrum of weeds controlled. Additionally, total vegetation control can be achieved with higher rates of SFM G-PRO 75 EG HERBICIDE plus residual-type companion herbicides. The use of a surfactant at 0.25% by volume will improve weed control.

AREAS OF 20" OR LESS ANNUAL RAINFALL (ARID AREAS)

Application Timing

Apply SFM G-PRO 75 EG HERBICIDE as a preemergence or early postemergence spray during the rainy season when weeds are actively germinating or growing.

Weeds Controlled

SFM G-PRO 75 EG HERBICIDE effectively controls the broadleaf weeds and grasses listed below when applied at the rates shown.

Application Rates

Apply SFM G-PRO 75 EG HERBICIDE at the rates indicated by weed type. When applied at lower rates, SFM G-PRO 75 EG HERBICIDE provides short-term control of listed weeds; when applied at higher rates, weed control is extended.

Broadleaf Weeds: 1½ to 2 oz. per acre

Annual sowthistle	Common yarrow
Black mustard	Curly dock
Buckhorn plantain	Prickly coontail
Burclover	Seaside heliotrope
Carolina geranium	Spreading orach
Chickweed	Sunflower
Common mallow	Western ragweed
Common speedwell	Whitestem filaree

Grasses : (up to 6 to 12" tall): ¾ to 1 ½ oz. per acre

Cheat	Medusahead
Downy brome	

Grasses : (up to 6 to 12" tall): 1½ to 2 oz. per acre (except smooth brome, see below)

Annual bluegrass	Red brome
Barnyardgrass	Reed canarygrass
	Ripgut brome
Foxtail barley	Seashore saltgrass
Foxtail fescue	Signalgrass
Italian ryegrass	Smooth brome (2 to 3 oz. per acre)
Jointed goatgrass	Yellow foxtail

Weeds listed in the AREAS OF 20" OR MORE ANNUAL RAINFALL section of this label can also be controlled in arid areas; however, SFM G-PRO 75 EG HERBICIDE must be applied at 3 to 8 oz. per acre

to control these weeds. Higher rates also provide control of severe infestations and longer-term control of weeds listed for arid areas.

AREAS OF 20" OR MORE ANNUAL RAINFALL

Application Timing

Apply SFM G-PRO 75 EG HERBICIDE as a preemergence or early postemergence spray during the rainy season when weeds are actively germinating or growing.

Weeds Controlled

SFM G-PRO 75 EG HERBICIDE effectively controls the broadleaf weeds and grasses listed below when applied at the rates shown.

Application Rates

Apply SFM G-PRO 75 EG HERBICIDE at the rates indicated by weed type. When applied at lower rates, SFM G-PRO 75 EG HERBICIDE provides short-term control of listed weeds; when applied at higher rates, weed control is extended.

Broadleaf Weeds: 3 to 5 oz. per acre

Bouncingbet
Burclover
Carolina geranium
Common chickweed
Common dandelion
Common speedwell
Common yarrow
Crimson clover
Dogfennel
Hoary cress (whitetop)
Little mallow
Mustard
Ox-eye daisy
Pepperweed

Pigweed
Purple starthistle
Ragweed
Sowthistle (annual)
Sunflower
Sweet clover
Tansymustard
Tansy ragwort
Tumble mustard
Vetch
Wild carrot
Wild oats
Yellow rocket

Broadleaf Weeds: 6 to 8 oz. per acre

Bedstraw
Canada thistle
Curly dock
Redstem filaree
Goldenrod

Horsetail (Equisetum)
Kudzu
Musk thistle
Turkey mullein
Wild blackberry

Grasses: 3 to 5 oz. per acre

Alta fescue
Annual bluegrass
Annual ryegrass
Bahia grass
Barnyardgrass
Downy brome
Fescue
Foxtails (except green)
Foxtail barley
Indiangrass
Italian ryegrass

Johnsongrass (6 to 8 oz. per acre) *

Kentucky bluegrass
Little barley
Red brome
Red fescue
Reed canarygrass
Ripgut brome
Ryegrass
Smooth brome
Sprangletop (annual)
Wheat (volunteer)

* For short-term (up to 3 months) control of johnsongrass, apply SFM G-PRO 75 EG HERBICIDE during early postemergence. Repeat treatment if additional control is desired or if regrowth occurs.

Note: Use the higher level of the recommended application range under the following conditions:

- In areas of severe infestation
- On soils containing > 2½% organic matter
- High soil moisture areas, such as along road edges or railroad shoulders

For planting areas treated with SFM G-PRO 75 EG HERBICIDE, refer to the GRASS REPLANT INTERVALS section of this label.

SPECIFIC WEED PROBLEMS

Noncrop Sites

Kochia, Russian Thistle, and Prickly Lettuce

Because kochia, Russian thistle and prickly lettuce are known to be resistant to SFM G-PRO 75 EG HERBICIDE, tank mixture combinations with herbicides having different modes of action, such as Payload®, KARMEX® DF, HYVAR® X or KROVAR® I DF must be used. In areas where resistance is known to exist, these weeds should be treated (postemergence) with other herbicides registered for their control, such as 2,4-D or dicamba. To avoid the spread of resistant biotypes, efforts should be taken to prevent these weeds from reseeding.

TANK MIX COMBINATIONS - Non-Crop Sites

- When tank mixing SFM G-Pro 75 EG HERBICIDE with other herbicides, always use the most restrictive directions for the intended combination.
- Do not tank mix SFM G-PRO 75 EG HERBICIDE with DuPont HYVAR® XL Herbicide.

Apply SFM G-PRO 75 EG HERBICIDE with companion herbicides using the rate and timing listed in the respective product labels. Add 2 to 8 oz. per acre of SFM G-PRO 75 EG HERBICIDE to the label recommended rates of the following herbicides in order to improve preemergence to early postemergence control of weeds and grasses: Payload®, DuPont HYVAR® X Herbicide, KARMEX® DF Herbicide, DuPont KROVAR® I DF Herbicide, DuPont VELPAR® L Herbicide, DuPont VELPAR® Herbicide, DuPont ESCORT® Herbicide (*do not use in California*), DuPont TELAR® Herbicide, glyphosate, dicamba, or 2,4-D.

UNDER ASPHALT AND CONCRETE PAVEMENT

IMPORTANT PRECAUTIONS (UNDER ASPHALT ONLY)

- Desirable plants may be injured if their roots extend into treated areas or if planted in treated areas.
- Do not use SFM G-PRO 75 EG HERBICIDE under pavement in residential properties such as driveways, or in recreational areas, including jogging or bike paths, tennis courts, or golf cart paths.

Application Information

SFM G-PRO 75 EG HERBICIDE can be used to control weeds under asphalt and concrete pavement such as in parking lots, highway shoulders, median strips, roadways, airports, military installations, storage areas and industrial plant sites. This product will not control tubers, rhizomes, woody vegetation such as small trees, brush or woody vines.

Use SFM G-PRO 75 EG HERBICIDE only in areas that has been prepared according to good construction practices. Use sufficient water to ensure uniform coverage (100 gallons/acre) and agitate the tank continuously to keep SFM G-PRO 75 EG HERBICIDE in suspension.

Application Timing

Apply SFM G-PRO 75 EG HERBICIDE immediately before paving to avoid lateral movement of the herbicide as a result of soil movement due to rainfall or mechanical means.

Application Rate

Apply 4 to 8 oz. of SFM G-PRO 75 EG HERBICIDE per acre. Use the higher rate on hard-to-control weeds and for long-term control.

TANK MIX COMBINATIONS - Under Asphalt and Concrete Pavement

For broader spectrum or extended control under asphalt or concrete pavement, SFM G-PRO 75 EG HERBICIDE may be tank mixed with HYVAR® X at 6 to 15 lbs. per acre or KROVAR® I DF at 7 to 15 lbs. per acre.

UNIMPROVED INDUSTRIAL TURF**IMPORTANT PRECAUTIONS**

- Excessive injury to turf may result if a surfactant is used with SFM G-PRO 75 EG HERBICIDE applications made to actively growing turf. *The user assumes all responsibility for turf injury if a surfactant is used with SFM G-PRO 75 EG HERBICIDE treatments applied to actively growing turf.*
- Injury may result when applications are made to turf that is under stress from drought, insects, disease, cold temperatures or late spring frost.
- SFM G-PRO 75 EG HERBICIDE may temporarily discolor or cause top kill of turf grasses.
- Applications made while turf is dormant may delay green-up in the spring.
- Annual retreatments may reduce the vigor of desirable turf, particularly at the higher recommended rates where bahiagrass, crested wheatgrass and smooth brome are grown.
- Turf stand reduction may result if SFM G-PRO 75 EG HERBICIDE is applied within 1 year of planting.

General Application Information

Use SFM G-PRO 75 EG HERBICIDE to control weeds on unimproved industrial turf, on roadsides, airports, military installations, lumberyards, petroleum tank farms, pipeline and utility rights-of-way, pumping installations, railroads, and storage areas where the turf is well established as a ground cover. Applications may temporarily suppress grass growth and inhibit seedhead formation (chemical mowing).

BAHIAGRASS RELEASE AND SEEDHEAD SUPPRESSION**Application Timing**

Apply ½ to 1 oz. per acre of SFM G-PRO 75 EG HERBICIDE after green-up and before seedheads emerge (boot stage). Ensure desirable grasses are well established at application as premature treatment may result in top kill and stand reduction of desirable turf. Make only one application per year.

BERMUDAGRASS RELEASE**Application Timing**

Apply SFM G-PRO 75 EG HERBICIDE after bermudagrass has broken dormancy and is well established (usually 30 days after initial spring flush). If additional control is necessary, apply again in late spring to early summer. On established weeds, apply SFM G-PRO 75 EG HERBICIDE 1 to 2 weeks after mowing.

SFM G-PRO 75 EG HERBICIDE can also be applied in late fall or early winter (refer to the listing of weeds controlled in the Noncrop Sites Weed Control section of this label). Use lower rates on small seedling weeds and higher rates on larger weeds.

Weeds Controlled

Use SFM G-PRO 75 EG HERBICIDE to control the following weeds when applied at the use rates shown.

Late Spring to Early Summer: 1 to 2 oz. per acre

Carolina Geranium
Fescue
Foxtail

Goldenrod
Spotted Spurge
Wild carrot

Spring to Fall: 2 to 3 oz. per acre

Johnsongrass

Late Fall to Early Winter: 1 to 4 oz. per acre

Carolina geranium
Common chickweed
Fescue

Little barley
Wild blackberry

Bermudagrass Tank Mix Combinations (South Only)

To control well-established bermudagrass during the summer, apply 1 to 2 oz. SFM G-PRO 75 EG HERBICIDE per acre as a tank mix with 3 to 4 lbs. active ingredient of MSMA per acre. Refer to the MSMA product label for a list of additional weeds that may be controlled. Two or more sequential applications of MSMA alone may be necessary to maintain weed control.

CENTIPEDE RELEASE**Application Timing**

Apply 1 to 2 oz. of SFM G-PRO 75 EG HERBICIDE per acre in the fall or early winter, or in the early summer following green-up of centipede. Refer to the listing of weeds controlled under BERMUDAGRASS RELEASE.

SMOOTH BROME AND CRESTED WHEATGRASS RELEASE AND SUPPRESSION**Application Timing**

Apply 1 oz. of SFM G-PRO 75 EG HERBICIDE per acre to turf after green-up and before seedheads emerge (boot stage). Make only one application per year. NOTE: Desirable grasses should be well established at time of application because premature treatment may result in top kill and stand reduction of desirable turf.

Weeds Controlled

Use SFM G-PRO 75 EG HERBICIDE to control the following weeds when applied at the use rates shown.

Late Spring to Early Summer: 1 oz. per acre

Downy brome
Foxtail

Goldenrod

GRASS REPLANT INTERVALS

Following a treatment of SFM G-PRO 75 EG HERBICIDE at use rates up to 2 oz. per acre, applied to soils with a pH of less than 7.5, the following grasses may be replanted at least 3 months after a spring application:

Green needlegrass
Meadow brome

Russian Wild Rye
Switchgrass

The following grasses may be replanted at least 6 months after a spring application:

Alta fescue	Meadow foxtail	Orchard grass
Smooth brome	Sheep fescue	Western wheatgrass

NOTE: Soils having a pH greater than 7.5 will require longer intervals.

Because SFM G-PRO 75 EG HERBICIDE degradation is slowed by cold or frozen soils, replant intervals should be determined as beginning in the spring following the fall applications.

Testing has indicated that there is considerable variation in response among species and types of grasses when seeded into areas treated with SFM G-PRO 75 EG HERBICIDE. If species other than those listed above are to be planted into areas treated with SFM G-PRO 75 EG HERBICIDE, a field bioassay should be performed prior to planting, or previous experience may be used to determine the feasibility of replanting treated areas. To conduct a field bioassay, grow to maturity test strips of the grass you intend to plant. The test strips should cross the entire planting area and include both high and low-lying ground. The response to the bioassay will indicate if it is safe to plant the desired grass.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container only.

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

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Gro-Pro LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Gro-Pro LLC and Seller harmless for any claims relating to such factors.

Gro-Pro LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Gro-Pro LLC, and Buyer and User assume the risk of any such use. GRO-PRO LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent allowed by state law, neither Gro-Pro LLC or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF GRO-PRO LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE,**

TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF GRO-PRO LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Gro-Pro LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Gro-Pro, LLC.

SFM G-Pro 75 EG Herbicide is not manufactured or distributed by DuPont, seller of Oust®.

Arsenal® is a registered trademark of BASF Specialty Products.

Escort®, Hyvar®, Krovar®, Oust®, Telar® and Velpar® are registered trademarks of E.I. du Pont de Nemours and Company.

Karmex® is a registered trademark of Griffin, LLC.

Aatrex® is a registered trademark of Syngenta Crop Protection, Inc.

Payload® is a registered trademark of Valent Professional Products.

PYXIS REGULATORY CONSULTING, INC.

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June 30, 2005

COURIER DELIVERY

Jim Tompkins (PM25)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

RE: Gro-Pro LLC – SFM G-Pro 75 EG Herbicide (EPA Reg. No. 79676-16)
Notification of Minor Label Revisions per PRN 98-10

Dear Mr. Tompkins,

On behalf of Gro-Pro LLC please find the enclosed notification of minor label revisions for Gro-Pro's SFM G-Pro 75 EG Herbicide (EPA Reg. No. 79676-16). Gro-Pro has added the statement "SFM G-Pro 75 EG Herbicide contains sulfometuron, the active ingredient used in Oust[®]" to the label front panel in accordance with the OGC letter signed by Robert Perlis (enclosed). Gro-Pro also added the statement "SFM G-Pro 75 EG is not manufactured or distributed by DuPont, seller of Oust[®]" to the SFM G-Pro 75 EG Herbicide label (last page).

In support of this notification, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the SFM G-Pro 75 EG Herbicide labeling with tracked changes
3. One (1) copy of the SFM G-Pro 75 EG Herbicide labeling with changes incorporated
4. May 5, 2005 Letter from the Office of General Counsel supporting label changes
5. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

21/21



Gro-Pro LLC
2214 Hwy 44 West
Inverness, FL 34453
877-637-6728

March 2, 2004

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Gro-Pro, LLC (EPA Company Number 79676), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

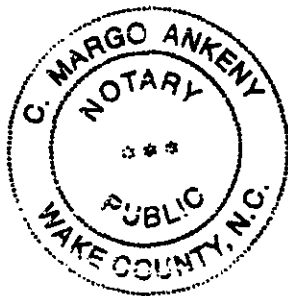
If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Randall V. Canady".

Randall V. Canady
Vice President, Marketing and Business Development

cc: Pyxis Regulatory Consulting, Inc.



NOTARIZED ON THE 3RD DAY
OF MARCH, 2004

EXPIRES 10/16/07

A handwritten signature in cursive script that reads "C. Margo Ankeny".