

87290-3

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY NOV 23 2010
Washington, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mr. Michael Kellogg
Willowood, LLC
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Subject: Supplemental Labels- Chemigation application on head lettuce, endive, escarole or radicchio (for use in California) and Aerial Application for grass and weed control in head lettuce (for use in California)
Product Name: Willowood Pronamide 50 WSP
EPA Reg. No. 87290-3
Application Dated August 23, 2010

Dear Mr. Kellogg:

The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you make the labeling change listed below:

1. To the supplemental label "Chemigation Application to Head lettuce, Endive, Escarole or Radicchio (For Use in California)": remove "Arizona and" from the Directions for Use Section heading "Chemigation Application on Head Lettuce, Endive, Escarole or Radicchio (For Use in **Arizona and** California)"

At your next label printing, or within eighteen (18) months of the date of this letter, whichever comes first, you must incorporate these supplemental labels into the main product labeling. A stamped copy of your label is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after eighteen (18) months from the date of this letter or the next printing of the label, whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Tompkins", written over a large, stylized circular flourish.

Jim Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

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

87290-3

RESTRICTED USE PESTICIDE

Because Pronamide has produced tumors in laboratory animals, this product is for retail sale to and use only by Certified Applicators or persons under their direct supervision, and only for those uses covered by the Certified Applicator's certification.

GROUP

3

HERBICIDE

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR WILLOWOOD PRONAMIDE 50 WSP BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

"Label" as used in this supplemental labeling refers to the label booklet for Willowood Pronamide 50 WSP and this supplement.

Willowood Pronamide 50 WSP

EPA Reg. No. 87290-3

**Chemigation Application on Head Lettuce, Endive, Escarole or Radicchio
(For Use in California)**

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.

This label must be in the possession of the user at the time of the herbicide application.

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

Notwithstanding chemigation prohibition on the package label, this supplemental label permits chemigation on the crops listed. Apply Willowood Pronamide 50 WSP by chemigation for weed control in direct seeded or transplanted head lettuce, endive, escarole or radicchio. Application must be made prior to weed emergence. Application may be made preemergence to head lettuce, endive, escarole, or radicchio greens or postemergence to head lettuce. **Do not apply postemergence to endive, escarole, or radicchio greens.**

Application Rate: Apply Willowood Pronamide 50 WSP at the rate of 1 to 2 lbs. per acre (0.5 to 1 lb. active ingredient per acre) depending upon soil type, weed species and level of infestation.

Application Moisture Requirements: Willowood Pronamide 50 WSP acts mainly through root absorption; therefore, it is necessary to move Willowood Pronamide 50 WSP into the root zone of germinating weeds to provide effective control. This can be accomplished by applying a minimum of 0.75 inch of overhead sprinkler irrigation when applied by chemigation to fields that have been pre-irrigated.

Time of Treatment: Applying Willowood Pronamide 50 WSP following initial irrigation of the crop will avoid movement of the herbicide below the root zone of germinating weeds and improve weed control. The optimal application timing following pre-irrigation will vary depending on season, weed species present and environmental conditions. The following information is provided as a general guideline:

Timing	Date	Application Timing (Days After Starting Sprinklers)
Early	Sept. 1 to Oct. 15	1-3
Mid	Oct. 15 to Dec. 15	3-6
Late	Dec. 15 to Jan.	5-6

Chemigation Equipment: Willowood Pronamide 50 WSP may be applied through center pivot, lateral move, solid set or hand move systems capable of uniform delivery of the herbicide. Solid set or hand move systems should be capable of delivering a uniform pressure of 60 to 70 psi at all nozzles. Pipes and nozzles must be positioned to provide uniform coverage of the treatment area. Placement of nozzles in a diamond shaped (♦) pattern will provide more uniform coverage. Do not apply when wind velocity is sufficient to distort uniformity of coverage or cause drift to susceptible non-target plants.

The injection-metering pump must be calibrated as specified by the manufacturer and checked periodically during application to ensure proper operation. Pesticide injection hoses, which connect chemigation-metering equipment to the sprinkler irrigation system, must be of braided reinforced construction with an internal tube made of nylon, cross-linked polyethylene, or high-density polyethylene.

Mixing: Mixing tanks should be large enough to contain the entire amount of herbicide mixture for the area to be treated. Use a minimum of 3 gallons of water per pound of Willowood Pronamide 50 WSP. Add Willowood Pronamide 50 WSP water-soluble packets slowly and allow packets to disperse completely before beginning injection. Agitation of the herbicide mixture is required at all times during mixing and application (injection).

Application: For hand move or solid set systems set up to deliver about 1/10 inch of water per hour, Willowood Pronamide 50 WSP should be injected over a period of 1 to 2 hours. Once the herbicide has been injected, continue irrigation for an additional 4 to 6 hours to flush the system and deliver additional irrigation sufficient to incorporate the herbicide into the upper inch of soil.

In pre-irrigated fields, center pivot or lateral move systems should be set up to deliver a minimum of 0.75 inch of irrigation water with the chemigation treatment. In center pivot or lateral move systems, the herbicide mixture should be injected continuously throughout the irrigation cycle.

Use Restrictions for Head Lettuce, Endive, Escarole or Radicchio

- In Fresno County, use only in the months of August through September
- **Preharvest Interval:** Do not apply within 55 days of harvest.
- Do not apply more than one application of Willowood Pronamide 50 WSP to each crop of head lettuce, endive, escarole, or radicchio greens.
- Do not apply Willowood Pronamide 50 WSP postemergence to endive, escarole, or radicchio greens.
- Do not apply more than 2 lbs. of Willowood Pronamide 50 WSP (1 lb. active ingredient) per acre.
- Do not apply to leaf lettuce.

Chemigation Instructions

Do not apply this product through any irrigation system unless the instructions for chemigation are followed. Apply this product only through continuously moving center pivot, lateral move end tow, solid set, or hand move irrigation systems. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers, or other experts.

A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Sprinkler Chemigation

1. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system.
2. The system must contain a functional check valve, vacuum relief valve, and low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back-flow.
3. The pesticide injection pipeline must contain a functional automatic, quick closing check valve to prevent the flow of fluid back toward the injection pump.
4. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
5. The system must contain functional interlocking control to automatically shut off the pesticide injection pump when the water pump motor stops.
6. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point that pesticide distribution is adversely affected.
7. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
8. Do not apply when wind speed favors drift beyond the area intended for treatment.

Read the "CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY" in the label booklet for Willowood Pronamide 50 WSP before using.

Willowood, LLC
1600 NW Garden Valley Blvd. #130
Roseburg, OR 97471

[EPA approval date]

5
6

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GROUP **3** HERBICIDE

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Willowood Pronamide 50 WSP

EPA Reg. No. 87290-3

**For Grass and Weed Control in Head Lettuce – Aerial Application
(For Use in California)**

ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 23 2010
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

KEEP OUT OF REACH OF CHILDREN

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CAUTION

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Willowood Pronamide 50 WSP may be applied by aircraft for preemergence control of susceptible grasses and broadleaf weeds in head lettuce. Willowood Pronamide 50 WSP must be applied at the dosage rate of 2.0 to 4.0 pounds of product (1.0 to 2.0 pounds active ingredient) per treated acre depending on soil type (refer to comments under Dosage below). Mix the specified amount of Willowood Pronamide 50 WSP in 10 to 20 gallons of water per acre for aerial application. For aerial applications of Willowood Pronamide 50 WSP on head lettuce, consult the section below for Rotation Crop Planting Information for plantback information. Avoid drift to all other crops and non-target areas.

Dosage

Willowood Pronamide 50 WSP may be applied at the rate of 2 to 4 lbs. of product (1 to 2 lbs. active ingredient) per acre broadcast application. The dosage rate required is dependent on soil texture and method of irrigation. At rates specified on this label, Willowood Pronamide 50 WSP may not be applied for weed control on highly organic (peat and muck) soils.

Follow the dosage instructions listed in chart below:

Lbs. of Willowood Pronamide 50 WSP Per Broadcast Acre		
	Dependable Rainfall	Less Dependable

Weeds	Or Overhead Irrigation	Rainfall or Furrow Irrigation	Soil Texture Group ²
susceptible annual gasses	2 - 3 (surface application)	3 - 4 (soil incorporation)	Coarse and medium Textured soils
broadleaf weeds	3 -4 (surface application)	4 (soil incorporation)	Fine textured soils

¹ Reduce dosage rate accordingly for banded applications.

² Soil Texture Group

- Coarse:** sand, loamy sand, sandy loam
- Medium:** loam, silt loam, silt, sandy clay loam
- Fine:** silty clay loam, clay loam, sandy clay, silty clay, clay

Rotation Crop Planting Information

Follow the directions given below when rotation crops will be planted to areas previously treated with Willowood Pronamide 50 WSP:

Waiting Period in Days Before Planting the Crops Indicated (1):

Amount of Willowood Pronamide 50 WSP Applied per Planted Acre	Root and Tuber Vegetables	Leafy Vegetables (except Brassica Vegetables), Crop Group 4 (2)	Barley, Buckwheat, Field Corn, Millet, Oats, Popcorn, Rice, Rye, Sorghum (milo), Teosinte, Triticale, Wheat, and Wild Rice
1.0 lb	90	30	180
2.0 lb	90	30	180
3.0 lb	90	30	180
4.0 lb	90	30	180

- (1) There are no plant back restrictions for Willowood Pronamide 50 WSP when rotating to artichokes, grapes, berry fruits, pome fruits or stone fruits.
- (2) Crop Group 4 as defined under 40CFR 180.41.

Whether Willowood Pronamide 50 WSP is bed-topped, banded, or broadcast, the beds must be knocked down and the field cross-disked before rotation crops other than artichokes, head lettuce, endive, radicchio or escarole are planted.

Where the Willowood Pronamide 50 WSP treatment is to be followed by a rotation crop within 180 days of application, bed-topped or banded applications are suggested.

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