A selective herbicide for controlling certain unwanted aquatic plants

Active Ingredient:  
2,4-dichlorophenoxyacetic acid, dimethylamine salt  ...............  20.0%  
Other Ingredients .................................................................  80.0%  
TOTAL .................................................................  100.0%  
2,4-d acid equivalence (a.e.): 16.5%

Sculpin* G herbicide for control of certain aquatic weeds in:  ponds; canals; and rivers and stream s that are quiescent or slow-flowing.  This product is designed to selectively control the weeds listed on this label.  While certain other weeds may be suppressed, control may be incomplete.  Reduced control may occur in lakes or ponds where water replacement comes from bottom springs.  Sculpin G is formulated on biodegradable granules that, when applied to water bodies, immediately deliver the herbicide down to the critical areas for controlling target weeds.  When applying Sculpin G follow all applicable use directions, precautions and limitations.  All Sculpin G concentrations referred to in this label are based on acid equivalence (a.e.).

PERSONAL PROTECTIVE EQUIPMENT (PPE)
All loaders, applicators, and other handlers must wear:
• Long-sleeve shirt and long pants;
• Shoes and socks;
• Chemical-resistant gloves; and
• Protective eyewear.

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

USER SAFETY RECOMMENDATIONS
Users should:
• Wash hands 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.  If pesticide gets on skin, wash immediately with soap and water.
• Remove PPE immediately after handling this product.  Wash the outside of gloves before removing.  As soon as possible, wash thoroughly and change into clean clothing.

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

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

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

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  Read all Directions for Use carefully before applying.

GENERAL INFORMATION
Use Sculpin* G herbicide for control of certain aquatic weeds in:  ponds; lakes; reservoirs; marshes; bayous drainage ditches; non-irrigation canals; and rivers and streams that are quiescent or slow-flowing.  This product is designed to selectively control the weeds listed on this label.  While certain other weeds may be suppressed, control may be incomplete.  Reduced control may occur in lakes or ponds where water replacement comes from bottom springs.  Sculpin G is formulated on biodegradable granules that, when applied to water bodies, immediately deliver the herbicide down to the critical areas for controlling target weeds.

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

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

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

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

Note to Physician:  Probable mucosal damage may contraindicate the use of gastric lavage.
GENERAL PRECAUTIONS AND RESTRICTIONS

- Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.
- Do not enter or allow people (or pets) to enter the treated area until dusts have settled.
- For requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Chemigation: Do not apply Sculpin G through any type of irrigation system.

Applications to a target area are limited to two (2) per season.

Do not enter or allow people (or pets) to enter the treated area until dusts have settled.

APPLICATIO N TO WATERS USED FOR IRRIGATION

Irrigation Restrictions

- Do not use treated water for irrigating greenhouse or nursery plants unless 2,4-D concentrations are confirmed to be less than 1 ppb by laboratory analysis.

- Do not use water treated with Sculpin G for hydroponic farming.

- Do not apply Sculpin G directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable susceptible broadleaf plants, and do not permit dust to drift into these areas.

- This label describes both required and recommended uses of a chemical analysis for the active ingredient 2,4-D. SePRO Corporation recommends the use of an Enzyme-Linked Immunoassay (ELISA) test for the determination of Sculpin G concentration in water. Contact SePRO Corporation for the incorporation of this analysis into your treatment program. Other proven chemical analysis for the active ingredient may also be used. The ELISA analysis is referenced in this label as the preferred method for the rapid determination of the concentration of the active ingredient in the water.

- If Sculpin G treated water is intended to be used only for crops or non-crop areas that are labeled for direct treatment with 2,4-D such as pastures, turf or established grasses, cereal grains, the treated water may be used to irrigate and/or mix sprays for these sites at any time during and after the application.

- Due to potential phytotoxicity and/or residue considerations, the following restrictions are applicable to other uses of irrigation water:

  - If treated water is intended to be used to irrigate or mix sprays for crops not labeled for direct treatment with 2,4-D, the water must not be used unless one of the following restrictions has been observed:

    - A setback distance described in Table 1 (Drinking Water Setback Distances) was used for the application;
    - A waiting period of 21 days from the time of application has elapsed; or
    - An approved assay indicates that the 2,4-D concentration is 100 ppb or less at the water intake. See Table 2 (Sampling for Drinking Water Analysis) for the recommended waiting periods after application but before taking the initial water sample at water intake.

  - If treated water is intended to be used to irrigate non-crop areas not labeled for direct treatment with 2,4-D (e.g., landscape ornamentals) or for other irrigation uses not described, consult with SePRO Corporation prior to commencing irrigation if 2,4-D concentrations are greater than 100 ppb.

APPLICATIONS TO POTABLE WATER SOURCES

Potable Water Restrictions

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

- The drinking water setback distances from functioning potable water intakes are provided in Table 1.

| TABLE 1 |
| DRINKING WATER SETBACK DISTANCES |
| Application concentration and minimum setback distance (ft) from functioning potable water intake |
| <1 ppm: 1.1 to 2.0 ppm | 2.1 to 3.0 ppm | 3.1 to 4.0 ppm |
| 600 | 1.200 | 1.800 | 2.400 |

† ppm acid equivalent target water concentration

- Following each application of Sculpin G, treated water must not be used for potable water unless one of the following restrictions has been observed:

  - A setback distance described in Table 1 was used for the application;
  - A waiting period of at least 21 days from the time of application has elapsed; or
  - An approved assay indicates that the 2,4-D concentration is 70 ppb or less at the water intake. Sampling for drinking water analysis should occur no sooner than stated in Table 2. **NOTE:** Analysis of 2,4-D in drinking water samples must be completed by a laboratory that is certified under the Safe Drinking Water Act to perform drinking water analysis using a currently approved version of analytical Method Number 515, 555, other methods for 2,4-D as may be listed in Title 40 CFR, Part 141.24, or Method Number 4015 (immunoassay of 2,4-D) from U.S. EPA Test Methods for Evaluating Solid Waste SW-846.

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

  - Example:
      - Postign notification should be located every 250 feet including the shoreline of the treated area and up to 250 feet of shoreline past the application site to include immediate public access points.
      - Posting should include the day and time of application. Posting may be removed if analysis of a sample collected at the intake no sooner than stated in Table 2 shows that the 2,4-D concentration is 70 ppb or less, or after 21 days following application, whichever occurs first.
      - **Text of notification:** “Wait 21 days before diverting functioning surface water intakes from the treated aquatic site to use as drinking water unless water at functioning drinking water intakes is tested no sooner than [insert days from Table 2] and is demonstrated by assay to contain no more than 70 ppb 2,4-D.

      - **Application Date:** ______  **Time:** _____.

  - **NOTE:** Existing potable water intakes that are no longer in use, such as those replaced by a connection to a municipal water system or a potable water well, are not considered to be functioning potable water intakes.

  - Drinking water setback distances do not apply to terrestrial applications of 2,4-D adjacent to water bodies with potable water intakes.
DRIFT MANAGEMENT
A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments applying this product. Applying Sculpin G through an enclosed eductor or slurry injection system via a continuous stream of water and/or injected under the water surface further minimizes drift potential.

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

Temperature Inversions
If applying at wind speeds less than 3 mph, the applicator must determine if: a) conditions of temperature inversion exist, or b) stable atmospheric conditions exist at or below application height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

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

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

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

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

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

How to Apply:
For Large Areas:
Use a fertilizer spreader or mechanical seeder such as the Gerber or Gandy or other equipment capable of uniformly applying this product. Before applying any chemical, calibrate your method of application to be sure of spreading the proper amount. When using boats and power equipment, you must determine the proper combination of (1) boat speed (2) rate of delivery from the spreader, and (3) width of swath covered by the granules.

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

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

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

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

4 mph x 20 feet x 100 Lbs./A = 16.1 lbs/min.
495

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

Table 3: Aquatic Plant Susceptibility to Sculpin G

<table>
<thead>
<tr>
<th>Plant Species</th>
<th>Sculpin G PPM†</th>
</tr>
</thead>
<tbody>
<tr>
<td>Susceptible Weeds</td>
<td>up to 1.0 to 4.0</td>
</tr>
<tr>
<td>watermilfoil (Myriophyllum spp.)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>coontail†† (Ceratophyllum demersum)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>water chestnut (Trapa natans)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>water stargrass†† (Heteranthera dubia)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>watershield (Brasenia spp.)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>white water lily (Nymphaea spp.)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>yellow water lily (Nuphar spp.)</td>
<td>up to 2.0 to 4.0</td>
</tr>
<tr>
<td>or spatterdock††</td>
<td>up to 2.0 to 4.0</td>
</tr>
</tbody>
</table>

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

Table 4: Pounds of Sculpin G to Apply for a Target Concentration of 2 and 4 PPM 2,4-D

<table>
<thead>
<tr>
<th>Surface Area</th>
<th>Average Depth (feet)</th>
<th>For typical conditions – 2 ppm (pounds)</th>
<th>For difficult conditions – 4 ppm (pounds)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 acre</td>
<td>1</td>
<td>32.7</td>
<td>65.4</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>65.4</td>
<td>130.9</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>98.2</td>
<td>196.3</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>130.9</td>
<td>261.8</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>163.6</td>
<td>327.2</td>
</tr>
</tbody>
</table>

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

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

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

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

NOTE: apply a maximum of 65.4 pounds of Sculpin G (10.8 lbs a.e.)/acre-foot per application. Do not exceed 4.0 ppm during any single application.
STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.

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

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

Nonrefillable Container Disposal (non-rigid, any size): Do not reuse or refill this container. Completely empty bag into application equipment. Offer for recycling if available. If recycling is not available, then dispose of empty bag in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

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

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

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

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