



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

February 21, 2008

Re: Updated Spray Drift Language for Pyrethroid Agricultural Use Products

Dear Registrant:

Background

You are receiving this letter because your company holds registrations for pyrethroid products used on agricultural crops (Attachment 1). In the Reregistration process for the pyrethroids registered prior to 1984, EPA determined that the existing spray drift language needed to be updated in order to be in compliance with FIFRA. Because of similarities in use patterns, and concern for exposure to aquatic resources, EPA believes that this updated language is necessary for all pyrethroid products with use on agricultural crops. Registrants of products containing chemicals that were reviewed through the Reregistration process will receive this notice separately. Please see Attachment 2 for a Label Table with the necessary spray drift label language.

The Agency believes that in the absence of this revised spray drift language, pyrethroid agricultural use products will not have sufficient directions for use to adequately protect human health and the environment and could therefore be considered “misbranded” under section 2(q) of FIFRA. To ensure that your products remain in compliance, you must submit amended labels for the products listed in Attachment 1, no later than September 2, 2008.

What You Need to Do

You must submit labels for the products listed in Attachment 1, no later than September 2, 2008, which only reflect these changes to the spray drift language and self-certify that no other label changes are included. Self-certification can be accomplished by adding the following language to your label amendment form: “I certify that the only changes made on the label are those necessary to comply with EPA’s letter of February 21, 2008.”

If the list included as Attachment 1 does not represent all of your agricultural crop products affected by this letter please identify missing products with your response. If you have any questions regarding this letter, or if you believe this letter does not apply to your product, please contact George LaRocca at (703) 305-6100.

Sincerely,

George LaRocca
Product Manager, Registration Division

Attachments:

Attachment 1: Registered Pyrethroid Agricultural Labels

Attachment 2: Revised Spray Drift Language for Pyrethroid Agricultural Labels

**Attachment 1:
Registered Pyrethroid Agricultural Labels**

ACTIVE INGREDIENT	EPA REG. NO.	PRODUCT NAME	COMPANY NAME
BIFENTHRIN	279-3069	CAPTURE 2 EC INSECTICIDE/MITICIDE	FMC
BIFENTHRIN	279-3108	BRIGADE WSB INSECTICIDE/MITICIDE	FMC
BIFENTHRIN	279-3114	CAPTURE 2EC-CAL INSECTICIDE/MITICIDE	FMC
BIFENTHRIN	279-3257	DOUBLE THREAT CP INSECTICIDE	FMC
BIFENTHRIN	279-3271	DOUBLE THREAT INSECTICIDE	FMC
BIFENTHRIN	279-3302	CAPTURE LFR INSECTICIDE	FMC
BIFENTHRIN	279-3312	CAPTURE 8% ME INSECTICIDE/MITICIDE	FMC
BIFENTHRIN	270-3313	BRIGADE 2C INSECTICIDE/MITICIDE	FMC
BIFENTHRIN	1381-196	TUNDRA EC	AGRILIANCE, LLC
BIFENTHRIN	1381-214	TUNDRA CA *	AGRILIANCE, LLC
BIFENTHRIN	5481-514	DISCIPLINE 2EC INSECTICIDE/MITICIDE	AMVAC
BIFENTHRIN	5481-517	DISCIPLINE 2EC	AMVAC
BIFENTHRIN	34704-858	SNIPER	LOVELAND PRODUCTS
BIFENTHRIN	66222-98	FANFARE 2EC-CAL	MAKHTESHIM AGAN NA
BIFENTHRIN	66222-99	FANFARE 2EC INSECTICIDE/MITICIDE	MAKHTESHIM AGAN NA
BIFENTHRIN	66330-336	BIFENTHRIN 2E AG *	ARYSTA LIFESCIENCE
BIFENTHRIN	70506-57	BIFENTURE EC AGRICULTURAL INSECTICIDE	UNITED PHOSPHORUS, INC.
BIFENTHRIN	70506-58	BIFENTURE EC-CA AGRICULTURAL INSECTICIDE	UNITED PHOSPHORUS, INC.
BIFENTHRIN	83222-1	BIFEN 2EC AG INSECTICIDE/MITICIDE	J. OLIVER PRODUCTS, LLC
BIFENTHRIN	83222-6	BIFEN AG 2EC *	J. OLIVER PRODUCTS, LLC
BIFENTHRIN	83520-4	BIFEN 25% EC	AXSS USA, LLC
ZETA-CYPERMETHRIN	279-3125	FURY 1.5 EC INSECTICIDE	FMC
ZETA-CYPERMETHRIN	279-3126	FURY 1.5 EW INSECTICIDE	FMC
ZETA-CYPERMETHRIN	279-3248	Z-CYPE 0.8 EW INSECTICIDE	FMC
ZETA-CYPERMETHRIN	279-3249	Z-CYPE 0.8 EC INSECTICIDE	FMC
ZETA-CYPERMETHRIN + BIFENTHRIN	279-3315	HERO INSECTICIDE	FMC
LAMBDA-CYHALOTHRIN	100-1112	Warrior Insecticide with Zeon Technology	SYNGENTA

ACTIVE INGREDIENT	EPA REG. NO.	PRODUCT NAME	COMPANY NAME
LAMBDA-CYHALOTHRIN	100-1097	Karate Insecticide with Zeon Technology	SYNGENTA
LAMBDA-CYHALOTHRIN	100-998	Karate Insecticide	SYNGENTA
LAMBDA-CYHALOTHRIN	100-1049	Karate CSO	SYNGENTA
LAMBDA-CYHALOTHRIN	100-1086	Karate EC-W	SYNGENTA
LAMBDA-CYHALOTHRIN	1381-210	NYSTIC Z INSECTICIDE	AGRILIANCE, LLC
LAMBDA-CYHALOTHRIN	1381-211	TAIGA Z INSECTICIDE	AGRILIANCE, LLC
LAMBDA-CYHALOTHRIN	19713-572	DREXEL L-C INSECTICIDE	DREXEL CHEMICAL
LAMBDA-CYHALOTHRIN	66222-104	LAMBDA-CY 1EC	MAKHTESHIM AGAN NA
LAMBDA-CYHALOTHRIN	70506-121	UPI-2005 EXP-06 RUP INSECTICIDE	UNITED PHOSPHORUS, INC.
LAMBDA-CYHALOTHRIN	71532-20	LAMBDA 13% INSECTICIDE	LG LIFE SCIENCES, LTD.
TEFLUTHRIN	100-1075	Force 3G	SYNGENTA
TEFLUTHRIN	100-1253	Force CS	SYNGENTA
GAMMA-CYHALOTHRIN	74921-3	PROAXIS	PYTECH CHEMICALS
GAMMA-CYHALOTHRIN	74921-2	PROLEX	PYTECH CHEMICALS
GAMMA-CYHALOTHRIN	67760-67	PROAXIS CHA	CHEMINOVA
GAMMA-CYHALOTHRIN	62719-522	PROAXIS EX	DOW AGROSCIENCES
GAMMA-CYHALOTHRIN	34704-953	CONSERO	LOVELAND PRODUCTS
ESFENVALERATE	352-515	DuPont™ Asana® XL Insecticide	DUPONT
ESFENVALERATE	71532-21	EsfenStar 8% EC Insecticide	LG LIFE SCIENCES, LTD.
ESFENVALERATE	53883-135	Esfenvalerate AG	CONTROL SOLUTIONS
FENPROPATHRIN	59639-35	DANITOL 2.4 EC SPRAY	VALENT
FENPROPATHRIN	59639-77	TAME 2.4 EC SPRAY INSECTICIDE	VALENT
DELTAMETHRIN	264-1007	Decis 0.2 EC	BAYER
DELTAMETHRIN	264-1011	Decis 1.5 EC	BAYER
CYFLUTHRIN	264-745	Baythroid 2	BAYER
CYFLUTHRIN	264-784	Renounce 20 WP	BAYER
BETA-CYFLUTHRIN	264-840	Baythroid XL	BAYER
TRALOMETHRIN	246-1004	Scout X-TRA® INSECTICIDE	BAYER
TRALOMETHRIN	264-1003	Scout® INSECTICIDE	BAYER
TRALOMETHRIN	264-1005	Scout® 0.3 EC INSECTICIDE	BAYER
TRALOMETHRIN	264-1010	Scout X-TRA® Gel INSECTICIDE	BAYER

Attachment 2: Revised Spray Drift Language for Pyrethroid Agricultural Labels

BUFFER ZONES

Vegetative Buffer Strip

Construct and maintain a minimum 10-foot-wide vegetative filter strip of grass or other permanent vegetation between the field edge and down gradient aquatic habitat (such as, but not limited to, lakes; reservoirs; rivers; permanent streams; marshes or natural ponds; estuaries; and commercial fish farm ponds).

Only apply products containing (*name of pyrethroid*) onto fields where a maintained vegetative buffer strip of at least 10 feet exists between the field and down gradient aquatic habitat.

For guidance, refer to the following publication for information on constructing and maintaining effective buffers:

Conservation Buffers to Reduce Pesticide Losses. Natural Resources Conservation Services. USDA, NRCS. 2000. Fort Worth, Texas. 25 pp.

http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs143_023819.pdf

Buffer Zone for Ground Application (groundboom, overhead chemigation, or airblast)

Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes, reservoirs, rivers, streams, marshes, ponds, estuaries, and commercial fish ponds).

Buffer Zone for ULV Aerial Application

Do not apply within 450 feet of aquatic habitats (such as, but not limited to, lakes, reservoirs, rivers, streams, marshes, ponds, estuaries, and commercial fish ponds).

Buffer Zone for Non-ULV Aerial Application

Do not apply within 150 feet of aquatic habitats (such as, but not limited to, lakes, reservoirs, rivers, streams, marshes, ponds, estuaries, and commercial fish ponds).

Spray Drift Requirements

Wind Direction and Speed

Only apply this product if the wind direction favors on-target deposition.

Do not apply when the wind velocity exceeds 15 mph.

Temperature Inversion

Do not make aerial or ground applications into temperature inversions.

Inversions are characterized by stable air and increasing temperatures with height above the ground. Mist or fog may indicate the presence of an inversion in humid areas. The applicator may detect the presence of an inversion by producing smoke and observing a smoke layer near the ground surface.

Droplet Size

Use only Medium or coarser spray nozzles (for ground and non-ULV aerial application) according to ASAE (S572) definition for standard nozzles. In conditions of low humidity and high temperatures, applicators should use a coarser droplet size.

Additional Requirements for Ground Applications

Wind speed must be measured adjacent to the application site on the upwind side, immediately prior to application.

For ground boom applications, apply using a nozzle height of no more than 4 feet above the ground or crop canopy.

For airblast applications, turn off outward pointing nozzles at row ends and when spraying the outer two rows. To minimize spray loss over the top in orchard applications, spray must be directed into the canopy.

Additional Requirements for Aerial Applications

The spray boom should be mounted on the aircraft as to minimize drift caused by wingtip or rotor vortices. The minimum practical boom length should be used and must not exceed 75% of the wing span or 80% rotor diameter.

Flight speed and nozzle orientation must be considered in determining droplet size.

Spray must be released at the lowest height consistent with pest control and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety.

When applications are made with a cross-wind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of the application area by adjusting the path of the aircraft upwind.