Appendix E

FIFRA Section 24(c) Special Local Need (SLN) Supplemental Labeling for the use of Renovate® 3 and OTF in New York State.

Supplemental Labeling Sepro

SePRO Corporation

11550 North Meridian Street, Suite 600

Carmel, IN 46032 USA

Renovate® 3

EPA Reg. No. 62719-37-67690

EPA 24(c) Special Local Need Registration SLN NY-060001 (For Distribution and Use Only in the State of New York)

For Control of Emersed, Submersed and Floating Aquatic Plants in Aquatic Sites

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for Renovate[®] 3 specialty herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- In the state of New York, Renovate 3 is registered under FIFRA Section 24(c) as a Special Local Need (SLN) registration. For the state of New York, this 24(c) supplemental labeling provides directions for use, including use precautions and limitations applicable to use of Renovate 3, and supersedes directions for use on the product label.
- Note to all pesticide applicators: Before application under any project program, notification of an approval by the NYS Department of Environmental Conservation is required, either by an aquatic permit issued pursuant to ECL Section 15.0313(4) or issuance of purchase permits for such use.
- Use of Renovate 3 according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Renovate 3.

Directions for Use

Use Renovate 3 for control of emersed, submersed and floating aquatic plants in aquatic sites such as ponds, lakes, reservoirs, non-irrigation canals, and ditches which have little or no continuous outflow, marshes and wetlands, including broadleaf and woody vegetation on banks and shores within or adjacent to these and other aquatic sites.

Refer to product label for Renovate 3 for Precautionary Statements, Environmental Hazards and Storage and Disposal.

General Use Precautions and Restrictions

When applying this product in tank mix combination, follow all applicable use directions, precautions and limitations on each manufacturer's label.

Chemigation: Do not apply this product through any type of irrigation system.

Irrigation: Do not use treated water for irrigation for 120 days following application. As an alternative to waiting 120 days, treated water may be used for irrigation once the triclopyr level in the intake water is determined to be non-detectable by laboratory analysis (immunoassay). There is no restriction on use of water from the treatment area to irrigate established grasses.

Water treated with Renovate 3 may not be used for irrigation purposes for 120 days after application or until residue levels of Renovate 3 are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Seasonal Irrigation Waters: Renovate 3 may be applied during the off-season to surface waters that are used for irrigation on a seasonable basis provided that there is a minimum of 120 days between applying Renovate 3 and the first use of treated water for irrigation purposes, or until residue levels of Renovate 3 are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Irrigation Canals/Ditches: Do not apply Renovate 3 to irrigation canals/ditches unless the 120-day restriction on irrigation water usage can be observed or residue levels of Renovate 3 are determined by laboratory analysis, or other appropriate means of analysis, to be 1 ppb or less.

Do not apply Renovate 3 directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants, and do not permit spray mists containing it to drift into them.

- Do not apply to salt water bays or estuaries.
- **Do not** apply directly to un-impounded rivers or streams.
- **Do not** apply on ditches or canals currently being used to transport irrigation water or that will be used for irrigation within 4 months following treatment. It is permissible to treat irrigation and non-irrigation ditch banks.
- Do not apply where runoff water may flow onto agricultural land as injury to crops may result.
- When making applications to control unwanted plants on banks or shorelines of moving water sites, minimize overspray to open water.
- The use of a mistblower is not recommended.

Grazing and Haying Restrictions

Except for lactating dairy animals, there are no grazing restrictions following application of this product.

- **Grazing Lactating Dairy Animals:** Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.
- Do not harvest hay for 14 days after application.
- Grazed areas of non-cropland and forestry sites may be spot treated if they comprise no more than 10% of the total grazable area.

Slaughter Restrictions: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Avoiding Injurious Spray Drift

Applications should be made only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured. It is suggested that a continuous smoke column at or near the spray site or a smoke generator on the spray equipment be used to detect air movement, lapse conditions, or temperature inversions (stable air). If the smoke layers or indicates a potential of hazardous spray drift, do not spray.

Aerial Application: For aerial application near susceptible crops, apply through a Microfoil[†] or Thru-Valve boom[†], or use a drift control additive labeled for aquatic use. Other drift reducing systems or thickened sprays prepared by using high viscosity inverting systems may be used if they are made as drift-free as mixtures containing thickening agents labeled for use in aquatics or applications made with the Microfoil or Thru-Valve boom. Keep spray pressures low enough to provide coarse spray droplets. Spray boom should be no longer than 3/4 of the rotor length. Do not use a thickening agent with the Microfoil or Thru-Valve booms, or other systems that cannot accommodate thick sprays. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions. If a spray thickening agent is used, follow all use recommendations and precautions on the product label.

[†]Reference within this label to a particular piece of equipment produced by or available from other parties is provided without consideration for use by the reader at its discretion and subject to the reader's independent circumstances, evaluation, and expertise. Such reference by SePRO is not intended as an endorsement of such equipment, shall not constitute a warranty (express or implied) of such equipment, and is not intended to imply that other equipment is not available and equally suitable. Any discussion of methods of use of such equipment does not imply that the reader should use the equipment other than

is advised in directions available from the equipment's manufacturer. The reader is responsible for exercising its own judgment and expertise, or consulting with sources other than SePRO, in selecting and determining how to use its equipment.

Spray Drift Management

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

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications:

- 1. The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the rotor.
- 2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the following Aerial Drift Reduction Advisory. [This information is advisory in nature and does not supersede mandatory label requirements.]

Aerial Drift Reduction Advisory

Information on Droplet Size: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. 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).

Controlling Droplet Size:

- **Volume** Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of Nozzles Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation** Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **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. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length: For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind: Drift potential is lowest between wind speeds of 2 to 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. **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 low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions: Applications should not occur during a local, low level temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature 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 the 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.

Sensitive Areas: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Ground Equipment: To aid in reducing spray drift, Renovate 3 should be used in thickened (high viscosity) spray mixtures using a labeled drift control additive, high viscosity invert system, or equivalent as directed by the manufacturer. With ground equipment, spray drift can be reduced by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when wind velocity is low (follow state regulations). In hand-gun applications, select the minimum spray pressure that will provide adequate plant coverage (without forming a mist). Do not apply with nozzles that produce a fine-droplet spray.

High Volume Leaf-Stem Treatment: To minimize spray drift, do not use pressure exceeding 50 psi at the spray nozzle and keep sprays no higher than brush tops. A labeled thickening agent may be used to reduce drift.

Plants Controlled by Renovate 3

Woody Plant Species

alder maples cascara mulberry arrowwood ceanothus ash cherry oaks Chinese tallow poison ivy aspen bear clover (bearmat) poison oak chinquapin choke cherry poplar beech

birch cottonwood salt-bush (Baccharis spp.)

blackberry crataegus (hawthorn) sweetgum blackgum locust waxmyrtle

Brazilian pepper Maleleuca (seedlings) willow

Annual and Perennial Broadleaf Weeds

burdock plantain tropical sodaapple
Canada thistle smartweed vetch
curly dock tansy ragwort wild lettuce

elephant ear

Aquatic Weeds

alligatorweed nuphar (spatterdock) purple loosestrife American lotus parrotfeather[†] waterhyacinth American frogbit aquatic sodaapple Eurasian watermilfoil milfoil species phragmites pickerelweed pennywort waterlily waterprimose watershield

Application Methods

Floating and Emerged Weeds

For control of waterhyacinth, alligatorweed (see specific directions below), and other susceptible emerged and floating herbaceous weeds and woody plants, apply 1 1/2 to 6 lb ae of triclopyr (2 to 8 quarts of Renovate 3) per acre as a foliar application using surface or aerial equipment. Use higher rates in the rate range when plants are mature, when the weed mass is dense, or for difficult to control species. Repeat as necessary to control regrowth and plants missed in the previous operation, but do not exceed a total of 6 lb ae of triclopyr (8 quarts of Renovate 3) per acre per annual growing season.

Use a non-ionic surfactant in the spray mixture to improve control. Follow all directions and use precautions on the aquatic surfactant label.

Apply when plants are actively growing.

Surface Application

Use a spray boom, handgun or other similar suitable equipment mounted on a boat or vehicle. Thorough wetting of foliage is essential for maximum effectiveness. Use 20 to 200 gallons per acre of spray mixture. Special precautions such as the use of low spray pressure, large droplet producing nozzles or addition of a labeled thickening agent may minimize spray drift in areas near sensitive crops.

Aerial Application (Helicopter Only)

Apply with a helicopter using a Microfoil or Thru-Valve boom, or a drift control additive in the spray solution. Apply in a minimum of 10 gallons of total spray mix per acre. Do not apply when weather conditions favor drift to sensitive areas. See label section on aerial application directions and precautions.

Waterhyacinth (Eichhornia crassipes)

Apply Renovate 3 at 1 1/2 to 6 lb ae of triclopyr (2 to 8 quarts of Renovate 3) per acre to control waterhyacinth. Apply when plants are actively growing. Use the higher rate in the rate range when the weed mass is dense. It is important to thoroughly wet all foliage with the spray mixture. Use a non-ionic surfactant in the spray mixture. A repeat treatment may be needed to control regrowth or plants missed in the previous treatment.

Alligatorweed (Alternanthera philoxeroides)

Apply Renovate 3 at 2 to 6 lb ae of triclopyr (3 to 8 quarts of Renovate 3) per acre to control alligatorweed. It is important to thoroughly wet all foliage with the spray mixture. For best results, add an approved non-ionic aquatic surfactant to the spray mixture. Alligatorweed growing outside the margins of a body of water can be controlled with this treatment. However, alligatorweed growing in water will only be partially controlled. Top growth above the water will be controlled, but the plant will likely regrow from tissue below the water surface.

Precautions for Potable Water Intakes – Lakes, Reservoirs, Ponds:

For applications of Renovate 3 to control floating and emerged weeds in lakes, reservoirs or ponds that contain a functioning potable water intake for human consumption, see chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

	Renovate 3 Application Rate, qt/acre					
Area Treated	2 qt/acre	4 qt/acre	6 qt/acre	8 qt/acre		
(acres)	Setback Distance (ft)					

[†]Re-treatment may be needed to achieve desired level of control.

<4	500	1,100	1,600	2,100
>4 - 8	700	1,400	2,200	2,900
>8 - 16	1,000	2,000	3,100	4,100
>16	1,400	2,900	4,300	5,800

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

To apply Renovate 3 around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 50 parts per billion (ppb) or less by laboratory analysis or immunoassay.

- Recreational Use of Water in Treatment Area: Do not swim in water treated with Renovate 3 for three (3) hours after treatment. There are no restrictions on use of water in the treatment area for fishing.
- Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Submerged Weeds

For control of Eurasian watermilfoil (*Myriophyllum spicatum*) and other susceptible submerged weeds in ponds, lakes, reservoirs, and in non-irrigation canals or ditches that have little or no continuous outflow, apply Renovate 3 as either a surface or subsurface application. Rates should be selected according to the rate chart below to provide a triclopyr concentration of 0.75 to 2.5 ppm ae in treated water. Use higher rates in the rate range in areas of greater water exchange. These areas may require a repeat application. However, total application of Renovate 3 must not exceed an application rate of 2.5 ppm of triclopyr for the treatment area per annual growing season.

Apply in spring or early summer when Eurasian watermilfoil or other submersed weeds are actively growing.

Areas near susceptible crops or other desirable broadleaf plants may be treated by subsurface injection applied by boat to avoid spray drift.

Subsurface Application

Apply desired amount of Renovate 3 per acre directly into the water through boat-mounted distribution systems. When treating target plants that are 6 feet below the surface of the water, trailing hoses should be used along with an aquatic approved sinking agent.

Surface Application

Apply the desired amount of Renovate 3 as either a concentrate or a spray mixture in water. However, use a minimum spray volume of 5 gallons per acre. Do not apply when weather conditions favor drift to sensitive areas.

Average water depth (feet) x 0.905 x target concentration (ppm) = gallons of Renovate 3 per surface acre treated.

Example: to achieve a 2 ppm concentration of triclopyr in water averaging 4 feet deep

4 x 0.905 x 2 ppm = 7.2 gallons of Renovate 3 per surface acre treated

	Concentration of Triclopyr Acid in Water (ppm ae)						
	0.75 ppm	1 ppm	1.5 ppm	2 ppm	2.5 ppm		
Water Depth (ft)	Gallons of Renovate 3 per Surface Acre at Specified Depth						
1	0.7	0.7 0.9 1.4 1.8					
2	1.4	1.8	2.7	3.6	4.6		
3	2.1	2.7	4.1	5.4	6.8		
4	2.7	3.6	5.4	7.2	9.1		
5	3.4	4.5	6.8	9	11.3		
6	4.1	5.4	8.1	10.9	13.6		

7	4.8	6.3	9.5	12.7	15.8
8	5.5	7.2	10.9	14.5	18.1
9	6.1	8.1	12.2	16.3	20.4
10	6.8	9	13.6	18.1	22.6
15	10.2	13.6	20.4	27.2	33.9
20	13.6	18.1	27.2	36.2	45.3

Precautions for Potable Water Intakes - Lakes, Reservoirs, Ponds:

For applications of Renovate 3 to control submerged weeds in lakes, reservoirs or ponds that contain a functioning potable water intake for human consumption, see the chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

	Concentration of Triclopyr Acid in Water (ppm ae)				
Area Treated	0.75 ppm	1 ppm	1.5 ppm	2 ppm	2.5 ppm
(acres)	Required Setback Distance (ft) from Potable Water Intake)
<4	1,300	1,700	2,500	3,400	4,200
>4 – 8	1,700	2,300	3,500	4,600	5,800
>8 – 16	2,400	3,300	4,900	6,500	8,200
>16 - 32	3,500	4,600	6,900	9,200	11,500
>32 acres,	Setback (ft) =	Setback (ft) =	Setback (ft) =	Setback (ft) =	Setback (ft) =
calculate a	sqrt* [(4102708	sqrt [(4,102,708	sqrt [(4,102,708	sqrt [(4,102,708	sqrt
setback using	x acres treated)	x acres treated)	x acres treated)	x acres treated)	[(4,102,708 x
the formula for	+	+	+	+	acres
the appropriate	981,690.7]/3.33	981,690.7]/2.50	981,690.7]/1.67	981,690.7]/1.25	treated) +
rate					981,690.7]

^{*}Sqrt = Square Root

Example Calculation 1: to apply 2.5 ppm Renovate 3 to 50 acres:

Example Calculation 2: to apply 0.75 ppm Renovate 3 to 50 acres:

Setback in feet =
$$\frac{\text{sqrt} [(4,102,708 \times 50) + 981,690.7]}{3.33}$$

= $\frac{\text{sqrt} [206,117,091]}{3.33}$
= $\frac{14,356.78}{3.33}$
= 4,311 feet
= 4,300 feet (rounded to nearest 100 feet)

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

To apply Renovate 3 around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 50 parts per billion (ppb) or less by laboratory analysis or immunoassay.

- Recreational Use of Water in Treatment Area: Do not swim in water treated with Renovate 3 for three (3) hours after treatment. There are no restrictions on use of water in the treatment area for fishing.
- Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Wetland Sites

Wetlands include flood plains, deltas, marshes, swamps, bogs, and transitional areas between upland and lowland sites. Wetlands may occur within forests, wildlife habitat restoration and management areas and similar sites as well as areas adjacent to or surrounding domestic water supply reservoirs, lakes and ponds.

For control of woody plants and broadleaf weeds in these sites, follow use directions and application methods on this label for terrestrial sites associated with wetland areas.

Use Precautions

Minimize overspray to open water when treating target vegetation in and around non-flowing, quiescent or transient water. When making applications to control unwanted plants on banks or shorelines of flowing water, minimize overspray to open water. **Note:** Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat such areas.

Purple Loosestrife (Lythrum salicaria)

Purple loosestrife can be controlled with foliar applications of Renovate 3. For broadcast applications, use a minimum of 4 1/2 to 6 lb ae of triclopyr (6 to 8 quarts of Renovate 3) per acre. Apply Renovate 3 when purple loosestrife is at the bud to mid-flowering stage of growth. Follow-up applications for control of regrowth should be made the following year in order to achieve increased control of this weed species. For all applications, a non-ionic surfactant labeled for aquatics should be added to the spray mixture. Follow all directions and use precautions on the label of the surfactant. Thorough wetting of the foliage and stems is necessary to achieve satisfactory control. A minimum spray volume of 50 gallons per acre is recommended for ground broadcast applications.

If using a backpack sprayer, a spray mixture containing 1% to 1.5% Renovate 3 or 5 to 7.6 fl oz of Renovate 3 per 4 gallons of water should be used. All purple loosestrife plants should be thoroughly wetted.

Phragmites (Phragmites australis)

Phragmites can be selectively controlled with foliar applications of Renovate 3. For broadcast applications, a minimum of 2 1/4 lb ae of triclopyr (3 quarts of Renovate 3) per acre should be used. For optimum control, apply Renovate 3 when phragmites is in the early state of growth, 1/2 to 3 feet in height, prior to seed head development. Follow-up applications for control of regrowth may be made the following year in order to achieve increased control of this weed species. For all applications, a non-ionic surfactant labeled for aquatics should be added to the spray mixture. Follow all directions and use precautions on the label of the surfactant. Thorough wetting of the foliage and stems is necessary to achieve satisfactory control. A minimum spray volume of 50 gallons per acre is recommended for ground broadcast applications.

If a backpack sprayer is used, a spray mixture containing 1% to 1.5% of Renovate 3 or 5 to 7.6 fl oz of Renovate 3 per 4 gallons of water should be used. All phragmites foliage should be thoroughly wetted.

Aerial application by helicopter may be needed when treating restoration sites that are inaccessible, remote, difficult to traverse, isolated, or otherwise unsuited to ground application, or in circumstances where invasive exotic weeds dominate native plant populations over extensive areas and efforts to restore native plant diversity are being conducted. By air, apply in a minimum spray volume of 30 gallons per acre using Thru-Valve or Microfoil boom only.

- Recreational Use of Water in Treatment Area: Do not swim in water treated with Renovate 3 for three (3) hours after treatment. There are no restrictions on use of water in the treatment area for fishing.
- Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Terrestrial Sites Associated With Wetland Areas

- Apply no more than 2 lb ae of triclopyr (2/3 gallon of Renovate 3) per acre per growing season on range and pasture sites, including rights-of-way, fence rows or any area where grazing or harvesting is allowed.
- On forestry sites, Renovate 3 may be used at rates up to 6 lb ae of triclopyr (2 gallons of Renovate 3) per acre per year.

Use Renovate 3 at rates of 3/4 to 6 lb ae of triclopyr (1/4 to 2 gallons of Renovate 3) per acre to control broadleaf weeds and woody plants. In all cases use the amount specified in enough water to give uniform and complete coverage of the plants to be controlled. Use only water suitable for spraying. Use a labeled non-ionic surfactant for all foliar applications. When using surfactants, follow the use directions and precautions listed on the surfactant manufacturer's label. Use the higher recommended concentrations of surfactant in the spray mixture when applying lower spray volumes per acre. The order of addition to the spray tank is water, spray thickening agent (if used), additional herbicide (if used), and Renovate 3. A labeled aquatic surfactant should be added to the spray tank last or as recommended on the product label. If combined with emulsifiable concentrate herbicides, moderate continuous adequate agitation is required.

Before using any recommended tank mixtures, read the directions and all use precautions on both labels.

For best results, apply when woody plants and weeds are actively growing. When hard to control species such as ash, blackgum, choke cherry, maples, or oaks are prevalent and during applications made in late summer when the plants are mature and during drought conditions, use the higher rates of Renovate 3.

When using Renovate 3 in combination with a 2,4-D herbicide approved for aquatic use, such as DMA 4 IVM, generally the higher rates should be used for satisfactory brush control.

Use the higher dosage rates when brush approaches an average of 15 feet in height or when the brush covers more than 60% of the area to be treated. If lower rates are used on hard to control species, resprouting may occur the year following treatment.

High Volume Foliage Treatment

For control of woody plants, use RENOVATE 3 at the rate of 3 to 6 lb ae of triclopyr (1 to 2 gallons of Renovate 3) per 100 gallons of spray solution, or Renovate 3 at 3/4 to 3 lb ae of triclopyr (1 to 4 quarts of Renovate 3) may be tank mixed with 1/4 to 1/2 gallons of 2,4-D 3.8 lb amine, like DMA 4 IVM, diluted to make 100 gallons of spray solution. Apply at a volume of 100 to 400 gallons of total spray per acre depending upon size and density of woody plants. Coverage should be thorough to wet all leaves, stems, and root collars. (See General Use Precautions and Restrictions.) Do not exceed the maximum allowable use rate of 6 lb ae of triclopyr (2 gallons of Renovate 3) per acre per growing season.

Low Volume Foliage Treatment

To control susceptible woody plants, apply up to 15 lb ae of triclopyr (5 gallons of Renovate 3) in 10 to 100 gallons of finished spray. The spray concentration of Renovate 3 and total spray volume per acre may be adjusted according to the size and density of target woody plants and kind of spray equipment used. With low volume sprays, use sufficient spray volume to obtain uniform coverage of target plants including the surfaces of all foliage, stems, and root collars (see General Use Precautions and Restrictions). For best results, a labeled aquatic surfactant should be added to all spray mixtures. Match equipment and delivery rate of spray nozzles to height and density of woody plants. When treating tall,

dense brush, a truck mounted spray gun with spray tips that deliver up to 2 gallons per minute at 40 to 60 psi may be required. Backpack or other types of specialized spray equipment with spray tips that deliver less than 1 gallon of spray per minute may be appropriate for short, low to moderate density brush.

Cut Surface Treatments (Woody Plants)

To control unwanted trees and other listed woody plants, apply Renovate 3, either undiluted or diluted in a 1 to 1 ratio with water as directed below.

With Tree Injector Method

Apply by injecting 1/2 milliliter of undiluted Renovate 3 or 1 milliliter of the diluted solution through the bark at intervals of 3 to 4 inches between centers of the injector wound. The injections should completely surround the tree at any convenient height. **Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is injected directly into plants.**

With Hack and Squirt Method

Make cuts at a convenient height around the tree trunk with a hatchet or similar equipment so that the cuts overlap slightly and make a continuous circle around the trunk. Spray 1/2 milliliter of undiluted Renovate 3 or 1 milliliter of the diluted solution into each cut.

With Frill or Girdle Method

Make a single girdle through the bark completely around the tree at a convenient height. Wet the cut surface with undiluted or diluted solution.

Both of the above methods may be used successfully at any season except during periods of heavy sap flow of certain species - for example, maples.

Stump Treatment

Spray or paint the cut surfaces of freshly cut stumps and stubs with undiluted Renovate 3. The cambium area next to the bark is the most vital area to wet.

[®]Trademark of Dow AgroSciences LLC Accepted: __/_/_ Initial printing.

Supplemental Labeling



SePRO Corporation

11550 North Meridian Street, Suite 600

Carmel, IN 46032 USA

Renovate® OTF

EPA Reg. No. 67690-42

EPA 24(c) Special Local Need Registration SLN NY-070004 (For Distribution and Use Only in the State of New York)

For Control of Emersed, Submersed and Floating Aquatic Plants in Aquatic Sites

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- Read the label affixed to the container for Renovate® OTF before applying. Carefully follow all precautionary statements and applicable use directions.
- In the state of New York, Renovate[®] OTF is registered under FIFRA Section 24(c) as a Special Local Need (SLN) registration. For the state of New York, this 24(c) supplemental labeling provides directions for use, including use precautions and limitations applicable to use of Renovate[®] OTF, and supersedes directions for use on the product label.
- Note to all pesticide applicators: Before application under any project program, notification of an approval by the NYS Department of Environmental Conservation is required, either by an aquatic permit issued pursuant to ECL Section 15.0313(4) or issuance of purchase permits for such use.
- Use of Renovate[®] OTF according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for Renovate[®] OTF.

DIRECTIONS FOR USE

Use Renovate[®] OTF for control of emersed, submersed and floating aquatic plants in the following aquatic sites: ponds; lakes; reservoirs; marshes; wetlands; impounded rivers, streams and other bodies of water that are quiescent; non-irrigation canals, seasonal irrigation waters and ditches which have little or no continuous outflow.

Refer to the product label of Renovate[®] OTF for *Precautionary Statements*, *Environmental Hazards* and *Storage and Disposal*.

General Use Precautions and Restrictions

- Chemigation: DO NOT apply this product through any type of irrigation system.
- **Irrigation:** Water treated with Renovate[®] OTF may not be used for irrigation purposes for 120 days after application or until triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less.

- Seasonal Irrigation Waters: Renovate® OTF may be applied during the off-season to surface waters that are used for irrigation on a seasonal basis, provided that there is a minimum of 120 days between Renovate® OTF application and the first use of treated water for irrigation purposes or until triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less.
- o **Irrigation Canals/Ditches**: <u>DO NOT</u> apply Renovate[®] OTF to irrigation canals/ditches unless the 120 day restriction on irrigation water usage can be observed or triclopyr residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb or less.
- <u>DO NOT</u> apply Renovate[®] OTF directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants, and do not permit granule dust to drift into them.
- <u>DO NOT</u> apply to salt water bays or estuaries.
- DO NOT apply directly to un-impounded rivers or streams.
- <u>DO NOT</u> apply on ditches or canals currently being used to transport irrigation water or that will be used for irrigation within 120 days following treatment or until triclopyr residue levels are determined to be 1.0 ppb or less.
- <u>DO NOT</u> apply where runoff water may flow onto agricultural land as injury to crops may result.
- Grazing and Haying Restrictions: Except for lactating dairy animals, there are no grazing restrictions following application of this product.
 - o **Grazing Lactating Dairy Animals**: <u>DO NOT</u> allow lactating dairy animals to graze treated areas until the next growing season following application of this product.
 - DO NOT harvest hay for 14 days after application.
 - Grazed areas of non-cropland and forestry sites may be spot treated if they comprise no more than 10% of the total grazable area.
- **Slaughter Restrictions**: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Best Management Practices for Drift Management

Equipment used in the application of Renovate[®] OTF should be carefully calibrated before use and checked frequently during application to be sure it is working properly and delivering a uniform distribution pattern. To prevent increased Renovate[®] OTF dosage above specified limits, do not overlap applications. Aerial application should be made only when the wind velocity is 2 to10 mph.

Applications should be made only when there is little or no hazard for volatility or dust drift, and when application can maintain Renovate[®] OTF placement in the intended area. Very small quantities of dust, which may not be visible, may seriously injure susceptible plants, and Renovate[®] OTF may be blown outside of the intended treatment area under extreme conditions. Do not spread Renovate[®] OTF when wind is blowing toward susceptible crops or ornamental plants that are near enough to be injured.

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

Ground Application Equipment: To aid in reducing drift, Renovate[®] OTF should be applied when wind velocity is low (follow state regulations; see *Sensitive Area* under *Aerial Drift Reduction Advisory* below).

Aerial Drift Reduction Advisory

This section is advisory in nature and does not supersede the mandatory label requirements.

Application Height: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces drift potential.

Swath Adjustment: When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (e.g. higher wind).

Wind: Drift potential is lowest between wind speeds of 2 - 10 mph (follow state regulations). However, many factors, including equipment type, determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. **Note:** Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect drift.

Sensitive Areas: Renovate[®] OTF should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Aquatic Weeds Controlled by Renovate® OTF

alligatorweed parrotfeather[†] yellow water lily (Nuphar spp., spatterdock)
American lotus pickerelweed white water lily (Nymphaea spp.)
bladderwort pennywort water primrose (Ludwigia spp.)
Eurasian watermilfoil smartweed watershield (Brasenia spp.)

APPLICATION METHODS

Surface Applications

Use a mechanical spreader such as a fertilizer spreader or mechanical seeder or similar equipment capable of uniformly applying Renovate® OTF. Before spreading any product, carefully calibrate the application equipment. 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.

Use the following formula to calibrate the spreader's delivery in pounds of Renovate® OTF per minute:

<u>Miles per hour X spreader width (feet) X pounds per acre</u> = Pounds per minute 495

Aerial Application (Helicopter Only)

Ensure uniform application. All equipment should be properly calibrated using blanks with similar physical characteristics to Renovate[®] OTF. To avoid streaked, uneven or overlapped application, use an appropriate tracking device (e.g. GPS). Refer to the *Aerial Drift Reduction Advisory* section of this label for additional precautions and instructions for aerial application.

[†]Retreatment may be needed to achieve desired level of control.

Floating and Emersed Weeds

For control of water lily's (Nymphaea spp. and Nuphar spp.), watershield (Brasenia spp.), and other susceptible emersed and floating herbaceous weeds, apply 0.75 to 2.5 ppm triclopyr per acre. Apply when plants are actively growing.

Use higher rates in the rate range when plants are mature, when the weed mass is dense, or for difficult to control species. Repeat as necessary to control regrowth, but do not exceed a total of 2.5 ppm triclopyr for the treatment area per annual growing season.

Submersed Weeds

For control of Eurasian watermilfoil (*Myriophyllum spicatum*) and other susceptible submerged weeds in ponds, lakes, reservoirs, impounded rivers, streams and other bodies of water that are quiescent; non-irrigation canals, and seasonal irrigation waters, or ditches that have little or no continuous outflow, apply Renovate[®] OTF using mechanical or portable granule spreading equipment. Rates should be selected according to the rate chart below to provide a triclopyr concentration of 0.75 to 2.5 ppm ae in treated water. Use of higher rates in the rate range is recommended in areas of greater water exchange. These areas may require a repeat application. However, total application of Renovate[®] OTF must not exceed an application rate of 2.5 ppm ae triclopyr for the treatment area per annual growing season.

For optimal control, apply when Eurasian watermilfoil or other submersed weeds are actively growing.

CONCENTRATION OF TRICLOPYR ACID IN WATER (PPM A.E.)							
	0.75 ppm 1.0 ppm 1.5 ppm 2.0 ppm 2.5 ppm						
Avg. Water Depth (ft)	Po	Pounds Renovate® OTF / acre (10% a.e.)					
1	20	27	41	54	68		
2	41	54	81	108	135		
3	61	81	122	162	203		
4 feet or greater	81	108	164	216	270		

Precautions for Potable Water Intakes:

For applications of Renovate[®] OTF to control floating, emersed, and submersed weeds in sites that contain a functioning potable water intake for human consumption, see the chart below to determine the minimum setback distances of the application from the functioning potable water intakes.

CONCENTRATION OF TRICLOPYR ACID IN WATER (PPM AE)							
Area Treated (acres)	0.75 ppm	1 ppm	1.5 ppm	2 ppm	2.5 ppm		
Alea Treateu (acres)	Requi	Required Setback Distance (ft) from Potable Water Intake					
<4	1,300	1,700	2,500	3,400	4,200		
>4 - 8	1,700	2,300	3,500	4,600	5,800		
>8 - 16	2,400	3,300	4,900	6,500	8,200		
>16 - 32	3,500	4,600	6,900	9,200	11,500		
>32 acres, calculate a	Setback (ft) =	Setback (ft) =	Setback (ft) =	Setback (ft) =	Setback (ft) =		
setback using the	sqrt [†]	sqrt [†]	sqrt [†]	sqrt [†]	sqrt [⊤]		
formula for the	[(4,102,708 X	[(4,102,708 X	[(4,102,708 X	[(4,102,708 X	[(4,102,708 X		
appropriate rate	acres	acres	acres	acres	acres		
	treated) +	treated) +	treated) +	treated) +	treated) +		
	981,690.7] /	981,690.7] /	981,690.7] /	981,690.7] /	981,690.7]		
	3.33	2.50	1.67	1.25			

†Sqrt = Square Root

Example Calculation 1: to apply 2.5 ppm Renovate[®] OTF to 50 acres:

```
Setback in feet = sqrt [(4,102,708 x 50) + 981,690.7]
= sqrt [206,117,091]
= 14,357 feet
= 14,400 feet (rounded to nearest 100 feet)
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Example Calculation 2: to apply 0.75 ppm Renovate[®] OTF to 50 acres:

Setback in feet =
$$\frac{\text{sqrt} [(4,102,708 \times 50) + 981,690.7]}{3.33}$$

= $\frac{\text{sqrt} [206,117,091]}{3.33}$
= $\frac{14,356.78}{3.33}$
= 4,311 feet
= **4,300** feet (rounded to nearest 100 feet)

Note: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

To apply Renovate[®] OTF around and within the distances noted above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 50 parts per billion (ppb) or less by laboratory analysis or immunoassay.

- Recreational Use of Water in Treatment Area: <u>DO NOT</u> swim in water treated with Renovate[®] OTF for three (3) hours after treatment. There are no restrictions on use of water in the treatment area for fishing.
- Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Wetland Sites

Wetlands include flood plains, deltas, marshes, swamps, bogs, and transitional areas between upland and lowland sites. Wetlands may occur within forests, wildlife habitat restoration and management areas and similar sites as well as areas adjacent to or surrounding domestic water supply reservoirs, lakes and ponds.

For control of emersed, floating or submersed aquatic weeds in wetland sites, follow use directions and application methods associated with the *Floating and Emersed* or *Submersed* sections on this label.

Use Precautions

Minimize unintentional application to open water when treating target vegetation in wetland sites. **Note:** Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat such areas.

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Manufactured by: SePRO Corporation Carmel, IN 46032 U.S.A.

FPL053007

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