Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 10/26/2020 10:23:41 PM
To: Meadows, Sarah [Meadows.Sarah@epa.gov]; Schmid, Emily [Schmid.Emily@epa.gov]
CC: Kenny, Daniel [Kenny.Dan@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Crawford, Lydia [Crawford.Lydia@epa.gov]
Subject: RE: Tavium Label

HI Sarah,

Thanks. One last question to hopefully ensure consistency, Bayer shared their label with us which has the following:

Ground Application (Hooded In-Row and Directed Layby)
Using a hooded sprayer or other drift reduction technology in combination with approved nozzles may further reduce drift potential. When applying XtendiMax® With VaporGrip® Technology by hooded in-row or layby sprayers, determine the amount of herbicide and water volume needed using the following formula:

$$\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast rate per acre} = \text{rate per treated acre}$$

$$\frac{\text{band width (inches)}}{\text{row width(inches)}} * \text{broadcast spray volume per acre} = \text{spray volume per treated acre}$$

We were instructed to remove this in our label comments received Friday (see below)

4.7.2 Ground Application (Hooded In-Row and Directed Layby)

Using a hooded sprayer or other drift reduction technology in combination with approved nozzles may further reduce drift potential. ~~When applying A21472 Plus VaporGrip Technology by hooded in-row or layby sprayers, determine the amount of herbicide and water volume needed using the following formula:~~

$$\cancel{\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast rate per acre} = \text{rate per treated acre}}$$

$$\cancel{\frac{\text{band width (inches)}}{\text{row width (inches)}} * \text{broadcast volume per acre} = \text{spray volume per treated acre}}$$

May we include the struck language back?

Thanks
Monty

From: Meadows, Sarah <Meadows.Sarah@epa.gov>
Sent: Monday, October 26, 2020 6:10 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Schmid, Emily <Schmid.Emily@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Subject: RE: Tavium Label

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Hi, Monty. You can go ahead and send me the new version now just in case we don't need another change. And there's no need for a highlighted copy, just a clean copy.

Thanks,

Sarah

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, October 26, 2020 6:08 PM
To: Meadows, Sarah <Meadows.Sarah@epa.gov>; Schmid, Emily <Schmid.Emily@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Subject: RE: Tavium Label

Hi Sarah,

I will have that put back and we can send it back in the event there the other change ends up not being required unless you prefer me to wait for the final label change.

Also, for ease of these final reviews, would you prefer I only include version highlighting these last changes or is it better to include the version with all changes in the earlier iterations highlighted..

Thanks
Monty

From: Meadows, Sarah <Meadows.Sarah@epa.gov>
Sent: Monday, October 26, 2020 5:37 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Schmid, Emily <Schmid.Emily@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Subject: RE: Tavium Label

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Hi, Monty. I noticed one statement has been removed that we'll need you to add back. I have noted it in the attached file. There may be one other label change needed tonight, but I wanted to go ahead and give you the heads up on this.

Thanks,

Sarah

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, October 26, 2020 5:02 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>

Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Subject: RE: Tavium Label

Hi Emily,

Thanks and again apologies for sending multiple version so quickly. I am available at anytime the rest of the day/evening if needed.

Best Regards,
Monty

From: Schmid, Emily <Schmid.Emily@epa.gov>
Sent: Monday, October 26, 2020 4:34 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Meadows, Sarah <Meadows.Sarah@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Subject: RE: Tavium Label

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Hi Monty,

Sarah is helping me check the label so I forwarded this latest version to her.

Thank you,
Emily

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, October 26, 2020 4:21 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: RE: Tavium Label
Importance: High

Hi Emily,

I was just alerted to one change that will be needed for a smoc maximum rate in the cotton sections. Specifically, section 8.1.1 section 3.b. should read as follows:

- DO NO exceed ~~3.71~~ 2.48 lb ai/A/year of S-metolachlor-containing products on medium- or fine -textured soils.

This is the only needed change.

I am very sorry for this needed correction and hope this does not create too much inconvenience.

Thanks
Monty

From: Dixon Monty USGR
Sent: Monday, October 26, 2020 4:03 PM

To: 'Schmid, Emily' <Schmid.Emily@epa.gov>; 'Crawford, Lydia' <Crawford.Lydia@epa.gov>
Cc: kenny.dan@epa.gov <kenny.dan@epa.gov>; 'Echeverria, Marietta' <Echeverria.Marietta@epa.gov>
Subject: RE: Tavium Label

Hello Emily,

My label team just provided this version that highights all changes made today including adding the typographical edits as well as those mentioned below. This version may be easier for your review. Please therefore find the clean and this version with only todays edits added.

Thanks
Monty

From: Dixon Monty USGR
Sent: Monday, October 26, 2020 3:56 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>; Crawford, Lydia <Crawford.Lydia@epa.gov>
Cc: kenny.dan@epa.gov <kenny.dan@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: RE: Tavium Label

Hi Emily,

Please find attached the revised labels. As requested, we have added page numbers and made the following changes:

Section (Page)	Previous Version	New Version
4.7 (16)	Applications of this product may qualify for reduced use restrictions, such as a reduced downwind buffer distance, provided a **qualified DRT** listed on www.TaviumTankMix.com is used and operated according to the directions and limitations provided at www.TaviumTankMix.com.	*Deleted based upon guidance below*
4.7.1 (16)	*Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:* ONLY **qualified** hooded/shielded sprayers listed on www.TaviumTankMix.com. are eligible for reduced use restrictions when applying this product. Refer to the website for specific application requirements when using a **qualified** hooded/shielded sprayer. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.	*Requirements for Reduced Use Restrictions with Optional Hooded/Shielded Sprayer:* **ONLY qualified** hooded/shielded sprayers listed on www.TaviumTankMix.com are eligible for reduced use restrictions when applying this product. If a **qualified** hooded/shielded sprayer is used for applications to dicamba-tolerant soybeans, the downwind buffer is 110 feet. While this product may be applied with other (non-qualified) hooded/shielded sprayers, no reduction in use restrictions is associated with their use.
6.3.7 (23)	Roads, paved or gravel surfaces, mowed and/or managed areas adjacent to fieldsuch as rights-of-ways.	Roads, paved or gravel surfaces, mowed grass areas adjacent to treated fields.

In addition, we corrected a couple of typos and removed the – from 240-foot to read 240 foot.

I have included a clean, highlighted (blue new edits) that includes all previous changes and then a single edit that shows the points in the chart above. Note the deletion in section 4.7 page 16 is not shown in the single edit but is in the hightlighted version with all edits.

Please let me know if can do anything else on my end.

Thanks
Monty

From: Dixon Monty USGR
Sent: Monday, October 26, 2020 3:16 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: Tavium Label

Hi Emily,

Just an update, hope to have label to you in next 15 to 20 minutes.

Thanks
Monty

From: Schmid, Emily <Schmid.Emily@epa.gov>
Sent: Monday, October 26, 2020 1:45 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Tavium Label

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Hi Monty,

Yes, I believe this is what he was talking about.

Add to "4.7 Optional Use of Drift Reduction Technology" (Page 15):
If approved hooded sprayer is used, the downwind buffer is 110'.

Let me know if I'm misunderstanding and you are looking for something else.

Thanks,
Emily

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, October 26, 2020 1:39 PM
To: Schmid, Emily <Schmid.Emily@epa.gov>
Subject: RE: Tavium Label

Hi Emily,

Yes, happy to do so. He had mentioned you were working on hooded sprayer language that we could incorporate. Do you have that by chance...if so we can add it to this version.

Thanks
Monty

From: Schmid, Emily <Schmid.Emily@epa.gov>
Sent: Monday, October 26, 2020 1:37 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: Tavium Label

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Hi Monty,

Dan let me know that you were working on last edits to the label. I noticed it doesn't have page numbers. Could you add those? It will fail QAQC without them and I don't want to risk that.

You can go ahead and send the revised label to me as soon as you have it ready.

Thanks!
Emily

Emily Schmid
Product Manager 25
Herbicide Branch
Registration Division, Office of Pesticide Programs
U.S. Environmental Protection Agency

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