

August 5, 2019

SFIREG Dicamba Work Group

Engenia® Label Language Guidance for Field Activities

*This document is intended to provide evidentiary guidance to inspectors and case reviewers for field activities involving RUP dicamba product labels. Pesticide regulatory agencies (State Lead Agencies or SLAs; Tribes; and Territories) should always default to their respective laws, regulations, policies or Standard Operating Procedures for complaint investigations or application monitoring, however, in the absence of other guidance or policies, the State FIFRA Issues Research and Evaluation Group (SFIREG) EPA Dicamba Ad Hoc Work Group has developed the following guidance document.*

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
<b>PPE</b>	
All mixers, loaders, applicators and other handlers must wear: <ul style="list-style-type: none"><li>• Long-sleeved shirt and long pants</li><li>• Waterproof gloves</li><li>• Shoes plus socks</li><li>• A NIOSH-approved dust/mist filtering respirator with any R, P, or HE filter.</li></ul>	Document PPE worn or capture in written statement. Verify applicator completed all requirements for respirator compliance, such as medical exam, training, fit testing and record keeping.
<b>Environmental Hazards</b>	
<ul style="list-style-type: none"><li>• <b>DO NOT</b> apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.</li><li>• <b>DO NOT</b> contaminate water when disposing of equipment washwater or rinsate.</li></ul>	Obtain written statement from applicator, conduct sampling to show application in prohibited areas, or disposal on prohibited sites.
<b>Ground and Surface Water Protection</b>	
<ul style="list-style-type: none"><li>• <b>DO NOT</b> mix or load this pesticide product within 50 feet of wells (including abandoned wells and drainage wells), sink holes, perennial or intermittent streams and rivers, and natural or impounded lakes and reservoirs.</li></ul>	Document by personal observation, written statement or sampling showing chemical residues in prohibited areas.
<ul style="list-style-type: none"><li>• <b>DO NOT</b> apply pesticide product within 50 feet of wells. (This setback does not apply to properly capped or plugged abandoned wells and does not apply to impervious pad or properly diked mixing/loading areas)</li></ul>	See guidance in previous bullet.
<ul style="list-style-type: none"><li>• Check valves or anti-siphoning devices must be used on all mixing equipment.</li></ul>	Photograph device or record type and model of equipment.
<b>Movement by Surface Runoff or Through Soil</b>	
<ul style="list-style-type: none"><li>• <b>DO NOT</b> apply under conditions which favor runoff.</li></ul>	Refer to state policy on what conditions favor runoff or result in ground water contamination, as this term may differ from state to state.

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply to impervious substrates such as paved or highly compacted surfaces in areas with high potential for ground water contamination.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply to soils classified as sand with less than 3% organic matter and where ground water depth is shallow.</li> </ul>	Document through soil maps what soil classification is for target site, then refer to state policies for definition of the term “shallow”.
<b>Movement by Water Erosion of Treated Soil</b>	
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply or incorporate this product through any type of irrigation system including sprinkler, drip, flood or furrow irrigation.</li> </ul>	Document by photograph or written statement that pesticide was applied using irrigation equipment.
<b>Endangered Species</b>	
<ul style="list-style-type: none"> <li>• When using this product, you must follow the measures contained in the Endangered Species Protection Bulletin for the area in which you are applying the product. To obtain Bulletins, no more than six months before using this product, consult <a href="http://www.epa.gov/espp/">http://www.epa.gov/espp/</a> or call 1-844-447-3813. You must use the Bulletin valid for the month in which you will apply the product.</li> </ul>	Verify applicator accessed ESPB website and obtained a Bulletin for the target site within 6 months of the application. Obtain a copy of the printed bulletin applicator retained, or collect written statement that applicator followed the application restrictions published in the Bulletin.
<ul style="list-style-type: none"> <li>• (From the label section titled Dicamba-tolerant (DT Crops): Within the defined areas, in combination with the 110 foot infield wind-directional spray drift buffer, a 57 foot omnidirectional infield buffer is required to protect federally listed threatened and endangered species. Non-sensitive areas defined below may be included as part of the buffer.</li> </ul>	The 57’ in-field buffer only applies to target sites located within a protection zone, and must be calculated as being inside the exterior border of the field. It is not in addition to the 110’-220’ wind direction buffer. Consult SFIREG guidance document for further details.
<b>Record Keeping Requirements</b>	
<ul style="list-style-type: none"> <li>• The certified applicator must <b>keep the following records for a period of two years;</b></li> </ul>	Obtain copy of application records. Some states may require retention for more than two years.
<ul style="list-style-type: none"> <li>• Records must be <b>generated within 72 hours after application and a record must be kept for every individual application.</b></li> </ul>	See guidance for previous bullet, determine if record was created no more than 72 hours after the application ended.
1. Full Name of certified applicator	Obtain copy of application records, collect written statement from applicator for clarification of missing or vague data.
2. Certification number of the certified applicator	“
3. Product Name	“
4. EPA registration number	“
5. Total amount applied	“
6. Application month, day and year	“
7. Crop planting date	Obtain written statement from applicator, verification most likely lies with producer who planted the field.
8. Start and finish times	Obtain copy of application records, collect written statement from applicator for clarification of missing or vague data.
9. Location of the application	“

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
10. Crop or site receiving the application	“
11. Size of area treated	“
12. Training requirement: proof that the applicator completed training described in this section.	Obtain written statement and/or copy of certification or training, or other evidence the applicator completed training before the application was made.
13. Application timing: whether the applicator applied this product pre-emergence or, the number of days after planting if the applicator applied this product post-emergence.	Obtain copy of application record, verification most likely lies with producer who planted the field.
14. Receipts of purchase	Obtain copy of receipt from applicator, purchaser or dealer.
15. Product label	Document by observation or written statement applicator had a copy of the label. Refer to state policy for determination of what satisfies possession of the label.
16. Sensitive areas, sensitive crops, and residential awareness	Obtain copy of application record or other written evidence that surrounding area was surveyed, or sensitive crops locator registry was consulted. Refer to state policy or SFIREG guidance for definition of sensitive crop, site or area.
17. Buffer requirement: record the buffer distance calculation and any areas included in the buffer distance calculations	Acceptable evidence would be diagrams or drawings showing buffer distances for the application, or other narrative explaining how buffer distances were established and maintained.
18. Spray system cleanout: at a minimum, records must include the <u>date</u> the applicator performed the required cleanout, and cleanout <u>method</u> that the applicator followed.	Obtain copy of application record, written statement, or other evidence of cleanout procedure used by the applicator. Procedure might be different from case to case. Some states have different interpretations for frequency of cleanout for consecutive loads.
19. Tank mix products: a list of tank mix partners, including pesticides, adjuvants, and other products, that he applicator tank mixed with this product for each application, and the EPA registration number in the case of any pesticides.	Obtain copy of application record, make sure to consult the correct iteration of the website posted at the time of the application.
20. Nozzle selection: which spray nozzle the applicator used and the nozzle pressure the applicator set the sprayer to.	Obtain copy of application record, determine by written statement which nozzles were used and whether spray pressure was measured in the cab or at nozzle.
21. Air temperature: the air temperature at boom height at the time the applicator starts and finishes the application of this product.	Obtain copy of application record, document the type of measuring device by photograph and written statement, and how the applicator operated it.

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
22. Wind speed and direction: the wind speed at boom height at the time the applicator starts and finishes applications of this product, and the wind direction at the time the applicator starts and finishes applications of this product.	Obtain copy of application record, determine by written statement which nozzles were used and whether spray pressure was measured in the cab or at nozzle.
<b>Training Requirements</b>	
<ul style="list-style-type: none"> <li>• Prior to applying this product in the 2019 growing season, all applicators must complete dicamba or auxin-specific training on an annual basis.</li> <li>• If training is available and required by the state where the applicator intends to apply this product, the applicator must complete that training.</li> <li>• If the state where the application is intended does not require auxin or dicamba-specific training, then the applicator must complete dicamba or auxin-specific training provided by one of the following sources: a) a registrant of a dicamba product approved for in-crop use with dicamba-tolerant crops, or b) a state or state-authorized provider.</li> </ul>	Obtain written statement and/or copy of certification or training, or other evidence the applicator completed training before the application was made.
<b>Storage and Disposal</b>	
Storage and Disposal language is similar to most other herbicide labels.	Photographs or written statements by applicator about how remaining concentrate pesticides are stored and how dilute pesticides are disposed.
<b>Product Stewardship Practices</b>	
EPA has indicated the language in this section is advisory in nature.	Refer to state policy on documentation of application rates, timing, weed species, weed sizes, tank mixes, field scouting and reporting as it applies to weed resistance management. Some states may have specific policies and obligations for applicators to avoid or prevent weed resistance.
<b>Resistance Management</b>	
EPA has indicated the language in this section is advisory in nature.	Refer to state policy on documentation of application rates, timing, weed species, weed sizes, tank mixes, field scouting and reporting as it applies to weed resistance management.
<b>Application Instructions</b>	
<ul style="list-style-type: none"> <li>• Make post-emergence applications of <b>Engenia</b> when broadleaf weeds are small and actively growing.</li> <li>• Use extreme care when applying <b>Engenia</b> to prevent injury to desirable plants.</li> </ul>	Refer to state policy on documentation of application rates, timing, weed species, weed sizes, tank mixes, field scouting and reporting as it applies to weed resistance management. Some states may have specific policies and obligations for applicators to avoid or prevent weed resistance.
<b>Application Methods and Equipment</b>	
<ul style="list-style-type: none"> <li>• Apply Engenia by ground.</li> </ul>	Obtain application record and/or written statements regarding type of application equipment used.

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<ul style="list-style-type: none"> <li>Calibrate application equipment for accurate target spray volume and application rate to ensure uniform distribution of spray and to avoid spray drift to nontarget areas.</li> </ul>	<p>Obtain written statement from applicator to determine how the equipment was calibrated. Refer to state enforcement program for documentation and enforcement response. Some states may have specific definitions for what they consider “proper” maintenance and calibration.</p>
<p><b>Broadcast Applications</b></p>	
<ul style="list-style-type: none"> <li>Unless noted in the crop-specific information section, use a spray volume of 15 gallons of water or more per treated acre.</li> </ul>	<p>Obtain written statement and application record to determine compliance.</p>
<p><b>Wiper Applications</b></p>	
<ul style="list-style-type: none"> <li><b>DO NOT</b> apply more than 12.8 fl ozs/A of Engenia [0.5 lb dicamba acid equivalent (ae) per acre] per application.</li> <li><b>DO NOT</b> contact desirable vegetation with herbicide solution.</li> <li><b>EXCEPTION: DO NOT</b> use wiper application on non-dicamba-tolerant cotton or soybean.</li> </ul>	<p>Obtain written statement and application record to determine compliance. Collect plant samples to determine if vegetation was contacted, refer to state policy on what meets the definition of the term “desirable”.</p>
<p><b>Spray System Equipment Clean-out</b> (This section has items 10 specific steps to take in order to clean the spray system.)</p>	
<ul style="list-style-type: none"> <li>As part of the Restricted Use Product requirements, applicator must document that they have complied with the Spray System Equipment Clean-out section of this label.</li> <li>The applicator must ensure that the spray system used to apply Engenia is clean before application. (This is then followed by some advisory language.) After using Engenia, clean all mixing and spray equipment (including tanks, pumps, lines, filters, screen and nozzles) with a strong detergent based sprayer cleaner. Dispose of rinsate in compliance with local, state, and federal guidelines.</li> </ul>	<p>Obtain written statement from applicator or other employee and application records. Refer to state policy on frequency of cleanout for compliance with label. Some states may require cleanout before and after each and every load, others may require cleanout before the first dicamba load and then again only before the tank mix changes.</p>
<p><b>Spray Drift Management</b></p>	
<ul style="list-style-type: none"> <li><b>DO NOT</b> allow herbicide solution to drip, physically drift, or splash onto desirable vegetation because severe injury or destruction to desirable broadleaf plants could result. The following physical drift management requirements must be followed. <b>Controlling Droplets</b></li> <li><b>Nozzle Type</b> – Use only approved nozzles when applying Engenia. To find a list of approved nozzles visit <a href="http://www.engeniatankmix.com">www.engeniatankmix.com</a> no more than seven days prior to applying Engenia.</li> </ul>	<p>Collect plant samples from desirable broadleaf plants to determine if herbicide made contact. Refer to state policies on what constitutes “desirable” vegetation, since some states may differ.</p> <p>Document through personal observation, application records or written statement about what nozzle type was used, what finished spray volume was applied, what the equipment ground speed was, what the spray boom height was, and</p>

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<ul style="list-style-type: none"> <li>• <b>Pressure</b> – <b>DO NOT</b> exceed the nozzle manufacturer’s specified pressures or maximum pressures as listed for specific nozzles on <a href="http://www.engeniatankmix.com">www.engeniatankmix.com</a>.</li> <li>• <b>Spray Volume</b> – Apply this product in a minimum of 15 gallons of spray solution per acre.</li> <li>• <b>Equipment Ground Speed</b> – Select a ground speed that will deliver the desired spray volume while maintaining the desired spray pressure, but <b>DO NOT</b> exceed a ground speed of 15 miles per hour.</li> <li>• <b>Spray Boom Height</b> – Spray at the appropriate boom height based on nozzle selection and nozzle spacing, but <b>DO NOT</b> exceed a boom height of 24 inches above the target pest or crop canopy.</li> </ul>	<p>what the wind speed was at the time of the application. For nozzle type, determine which iteration of the website was current during the application.</p> <p>Determine whether equipment is capable of lowering the entire boom to 24” above crop height, document by photograph and measuring tool.</p>
<p><b>Temperature Inversions</b></p> <ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply Engenia when temperature inversions exist at the field level.</li> <li>• <b>Apply only during the following period: DO NOT</b> make applications at night. Applications are only permitted beginning one hour after sunrise, and ending two hours before sunset.</li> </ul>	<p>Because there is no official definition of what constitutes a temperature inversion, and there is no reliable way of determining when an inversion is present after the fact, this language is largely unenforceable.</p> <p>Obtain copy of application record and written statement from applicator, consider NOAA solar calculator for determining times.</p>
<p><b>Treatment Zone Awareness and Buffer Requirements (Sensitive Areas, Sensitive Crops and Residential Areas)</b></p>	
<p><b>Sensitive Areas</b></p> <ul style="list-style-type: none"> <li>• <b>Spray Buffer Requirement:</b> Applicator must always maintain a 110 foot buffer when applying this product from the downwind outer edges of the field.</li> <li>• <b>To maintain the required buffer zone:</b></li> <li>• No application swath containing Engenia can be initiated in, or into an area that is within the applicable buffer distance.</li> <li>• <b>Nonsensitive Crops and Areas</b> (see Definitions) – May be included in the buffer distance calculation when within 110 feet of field edges.</li> </ul> <p><b>Sensitive Crops and Residential Areas</b></p> <ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply under circumstances where spray drift may occur to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.</li> </ul>	<p>Obtain application records, applicator written statement or other field evidence (such as visual damage to sensitive plants, or samples showing detection of chemical residues) to determine buffer distance maintained.</p> <p>The terms “neighboring sensitive crops”, “downwind sensitive crops and residential areas”, and “appropriate distance” are poorly defined, therefore, document by application records and/or applicator statement what distance was maintained, what plants or areas were considered sensitive, and when the applicator made those decisions. Refer to state policy on these terms.</p>

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
<ul style="list-style-type: none"> <li>• During application and sprayer clean-out, <b>DO NOT</b> allow contact of herbicide with foliage, green stems, exposed non-woody roots of crops, and desirable plants.</li> <li>• <b>Downwind and Shifting Winds</b> <ul style="list-style-type: none"> <li>- <b>DO NOT</b> apply when wind is blowing in the direction of neighboring sensitive crops or residential areas.</li> <li>- <b>The appropriate distance must be determined by the applicator</b> relative to where the application is being made, the environmental conditions, and the potential risk to downwind sensitive crops and residential areas.</li> <li>- The applicator also must be aware that <b>WIND DIRECTION</b> may vary during the application. If wind direction shifts such that the wind is blowing toward neighboring sensitive crops or residential areas, <b>STOP</b> the application.</li> <li>- <b>Survey the area before spraying:</b> Small amounts of spray drift that may not be visible may injure sensitive broadleaf plants. Before making an application, the applicator must survey the application site for neighboring sensitive crops and residential areas. The applicator must consult sensitive crop registries where available.</li> </ul> </li> </ul>	<p>Obtain reliable weather records for date, time and close location for target site. Consider using multiple nearby weather stations to verify data. Refer to state policy on what is considered “adjacent non-dicamba tolerant sensitive crops”, since this could vary from state to state.</p> <p>Obtain application records, written statement or other evidence (such as nearby weather station data) that indicate what wind direction was throughout the application period. Determine if applicator recorded wind shifts during application.</p> <p>Obtain written statement or other documentation showing applicator consulted sensitive crop registry or conducted field survey.</p>
<p><b>Wind Speed and Direction Requirements</b></p>	
<ul style="list-style-type: none"> <li>• <b>Wind Speed</b> – 3 to 10 mph</li> <li>• <b>Wind Direction</b> – Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect drift.</li> </ul>	<p>Obtain reliable weather data to determine wind speed and direction at time of the application.</p> <p>Refer to state policy on whether second bullet requires compliance by applicator.</p>
<p><b>Tank Mixing Information</b></p>	
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> tank mix any product with Engenia unless: <ol style="list-style-type: none"> <li>1. You check the list of EPA approved products for use with Engenia at <a href="http://www.engeniatankmix.com">www.engeniatankmix.com</a> no more than 7 days before applying Engenia; and</li> <li>2. The intended product tank mix with Engenia is identified on that list of tested and approved products; and</li> <li>3. The intended product to be tank mixed with Engenia is not prohibited on this label.</li> </ol> </li> <li>4. Additional Warnings and Restrictions: <ul style="list-style-type: none"> <li>• <b>DO NOT</b> tank mix products containing ammonium salts such as ammonium sulfate and urea ammonium nitrate (UAN).</li> </ul> </li> </ul>	<p>Use standard operating procedures for evidence documentation, document the iteration of the website used within 7 days of the application. Consult records or consider possible tank sampling to verify AMS or UAN was not added.</p>

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> add adjuvants that will further decrease pH or acidify the spray solution.</li> </ul>	
<p><b>Use Restrictions</b></p>	
<p><b>Applicator MUST ALSO follow restrictions under Crop-Specific Information section(s)</b></p>	
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply this product aerially.</li> <li>• <b>DO NOT</b> apply Engenia with ammonium-containing additives, conditioners, or fertilizers (e.g. AMS, UAN).</li> <li>• <b>DO NOT</b> apply Engenia if expected rainfall amount may exceed soil field capacity and result in soil runoff in the next 24 hours.</li> <li>• <b>DO NOT</b> apply Engenia if wind speed is less than 3 mph or greater than 10 mph.</li> <li>• <b>DO NOT</b> apply Engenia at night. <b>DO NOT</b> apply earlier than one hour after sunrise or later than two hours before sunset.</li> <li>• <b>DO NOT</b> contaminate irrigation ditches or water used for domestic purposes.</li> <li>• <b>DO NOT</b> apply Engenia through any type of irrigation equipment.</li> <li>• <b>DO NOT</b> tank mix Engenia with Lorsban® insecticide.</li> <li>• In DT cotton, <b>DO NOT</b> apply Engenia late than 60 days after planting or mid-bloom, whichever comes first.</li> <li>• In DT soybeans, <b>DO NOT</b> apply Engenia later than 45 days after planting or R1, whichever comes first.</li> </ul>	<p>Obtain application record and/or written statements regarding type of application equipment used.</p> <p>Obtain copy of application record or written statement documenting whether prohibited additives were part of the tank mix.</p> <p>Document by reliable weather data whether rainfall was predicted for application area, how much rainfall was predicted, and also whether the rainfall that did fall resulted in soil runoff within 24 hours of the application. Collect written statement from application whether soil conditions favorable for runoff were taken into consideration prior to the application, and whether applicator recorded predicted rainfall totals for the day of application.</p> <p>Obtain reliable weather data to determine wind speed and direction at time of the application.</p> <p>Obtain copy of application record, consider NOAA solar calculator for determining times of sunset and sunrise for application site.</p> <p>Obtain copy of application record, verification most likely lies with producer who planted the field.</p>
<p><b>Dicamba Tolerant (DT) Cotton Restrictions</b></p>	
<ul style="list-style-type: none"> <li>• <b>Maximum Application Rates in DT Cotton</b>  Single Pre-plant, Pre-emergence, Post-emergence: 12.8 fl ozs/A  All Applications Combined Total per Season: 51.2 fl ozs/A  Total Pre-plant and Pre-emergence: 25.6 fl ozs/A  Total Pre-emergence: 25.6 fl ozs/A</li> <li>• <b>DO NOT</b> apply Engenia post-emergence more than twice in a season.</li> </ul>	<p>Obtain statement from applicator and copy of all application records for field in question to determine compliance with maximum application rates, repeat applications, and date or plant growth state at time of application.</p>

LABEL STATEMENTS	EVIDENCE OR DOCUMENTATION
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply Engenia to non-dicamba-tolerant cotton varieties other than as directed or severe cotton injury will occur.</li> <li>• <b>DO NOT</b> make more than two application pre-plant or Pre-emergence per year.</li> <li>• <b>DO NOT</b> apply more than 12.8 fl ozs/A (0.5 lb ae/A) per pre-plant or pre-emergence application.</li> <li>• <b>DO NOT</b> make more than two applications post-emergence per year.</li> <li>• <b>DO NOT</b> apply more than 12.8 fl ozs/A (0.5 lb ae/A) per post-emergence application.</li> <li>• <b>DO NOT</b> apply Engenia later than 60 days after planting or mid-bloom, whichever comes first.</li> <li>• <b>DO NOT</b> apply more than 51.2 fl ozs/A(2 lbs ae/A) per season.</li> </ul>	
<p><b>Dicamba Tolerant (DT) Soybean Restrictions</b></p>	
<p><b>Maximum Application Rates in DT Soybean</b>  Single Pre-plant, Pre-emergence, Post-emergence: 12.8 fl ozs/A  All Applications Combined Total per Season: 51.2 fl ozs/A  Total Pre-plant and Pre-emergence: 25.6 fl ozs/A  Total Post-emergence: 25.6 fl ozs/A</p>	<p>Obtain statement from applicator and copy of all application records for field in question to determine compliance with maximum application rates, repeat applications, and date or plant growth state at time of application.</p>
<ul style="list-style-type: none"> <li>• <b>DO NOT</b> apply more than a maximum cumulative total of 25.6 fl ozs/A of Engenia post-emergence.</li> <li>• <b>DO NOT</b> apply Engenia to non-dicamba-tolerant soybean varieties other than as directed or severe soybean injury will occur.</li> <li>• <b>DO NOT</b> make more than two application pre-plant or pre-emergence per year.</li> <li>• <b>DO NOT</b> apply more than 12.8 fl ozs/A (0.5 lb ae/A) per pre-plant or pre-emergence application.</li> <li>• <b>DO NOT</b> make more than two applications post-emergence per year.</li>   <li>• <b>DO NOT</b> apply more than 12.8 fl ozs/A (0.5 lb ae/A) per post-emergence application.</li> <li>• <b>DO NOT</b> apply Engenia later than 45 days after planting or R1, whichever comes first.</li> <li>• <b>DO NOT</b> apply more than 51.2 fl ozs/A (2 lb ae/A) per season.</li>   <li>• <b>Soybean Forage:</b> Allow at least 7 days between final application and harvest or feeding of soybean forage.</li> </ul>	<p>Obtain application records and written statements from applicator. Obtain statement from producer, agronomist or other knowledgeable person about growth stage of crop to determine if application was made after crop stage was reached.</p>

<b>LABEL STATEMENTS</b>	<b>EVIDENCE OR DOCUMENTATION</b>
<ul style="list-style-type: none"><li>• <b>Soybean Hay:</b> Allow at least 14 days between final application and harvest or feeding of soybean hay.</li></ul>	
<b>Crop-Specific Directions</b>	Obtain application records and written statement from applicator and producer to determine when application and harvest occurred. Obtain statement from producer and seed test to determine compliance with germination of seed crop, if this is a focus of the investigation.