



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Massachusetts Department of Agricultural Resources
Pesticide Bureau
251 Causeway Street, Suite 500
Boston MA 02114

Effective Date: April 15, 2021
Expiration Date: June 30, 2021
Report Due Date: December 30, 2021
File Symbol: 21MA01

Attn: Hotze Wijnja

The Environmental Protection Agency hereby re-issues a specific exemption under the provisions of Section 18 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended, to the Massachusetts Department of Agricultural Resources (MDAR) for the use of pronamide (also known as propyzamide) (CAS No. 23950-58-5), in cranberry to control dodder (*Cuscuta gronovii*) in Massachusetts.

In a letter dated January 29, 2021, the MDAR recertified that the emergency condition still exists and that the only change to the use directions approved in the last authorization letter dated February 6, 2020 is a revision to item #7 in the authorization document, which is reflected in an amendment dated April 7, 2020. This specific exemption is subject to the conditions set forth in your request as well as the following conditions, modifications, and restrictions below:

1. The MDAR is responsible for ensuring that all provisions of this specific exemption are met. MDAR is also responsible for providing information in accordance with 40 CFR 166.32(b). Accordingly, a final report summarizing the results of this program must be submitted to EPA headquarters and the EPA Region 1 office within 6 months following the expiration of this exemption or prior to requesting another quarantine exemption for this use. In accordance with 40 CFR 166.32(a) these offices shall also be immediately informed of any adverse effects resulting from the use of this pesticide in connection with this exemption. Any future correspondence in connection with this exemption should refer to file symbol: **21MA01.**
2. The registered product, Kerb[®] SC (EPA Reg. No. 62719-578, containing 35.6% pronamide) manufactured by Dow Agrosiences, LLC/Corteva Agriscience, may be applied. All applicable directions for use, restrictions, and precautions on the EPA-registered product label including Worker Protection Standards must be followed, as well as those outlined in the Section 18 use directions except as modified in this authorization document.

3. A maximum of two pre-emergence broadcast applications per acre per season of Kerb[®] SC may be made through irrigation systems (chemigation) or boom-sprayer only. One application may be made at use rates of 2.5 - 5.0 pints of product (1.0 - 2.0 lb a.i.) per broadcast acre. Alternatively, two split applications of Kerb[®] SC may be made at a rate of 2.5 pints of product (1.0 lb a.i.) per acre. Total product applied must not exceed 5.0 pints of product (2.0 lb pronamide) per acre per season, whether resulting from a single or split application.
4. A pre-harvest interval (PHI) of 75 days, a 20-day minimum retreatment interval (RTI) and a restricted entry interval (REI) of 24 hours must be observed.
5. Follow boom sprayer applications with 0.1 - 0.2 inches of irrigation. Applications must be made after the winter flood has been withdrawn and prior to dodder emergence. Applications by aircraft are prohibited.
6. Applicators and other handlers must wear the following Personal Protective Equipment (PPE): (1) coveralls over short-sleeved shirt and short pants, (2) chemical-resistant gloves, (3) chemical-resistant footwear plus socks, (4) chemical-resistant headgear for overhead exposure, and (5) chemical-resistant apron when cleaning equipment, mixing or loading.
7. When making applications with a mechanically propelled boom sprayer, applicators must use a closed mixing/loading system and use an enclosed cab vehicle.
8. A maximum of 5,000 acres of cranberries may be treated in the following Massachusetts counties: Barnstable, Bristol, Norfolk, Nantucket, Plymouth and Worcester.
9. This specific exemption expires June 30, 2021.
10. Applications made in accordance with the above provisions are not expected to exceed combined residues of pronamide, including its metabolites and degradates, in or on cranberry at 1.0 ppm. The Agency has determined this level is adequate to protect public health. A time-limited tolerance in connection with a previous action has been established in 40 CFR §180.317(b) to support this emergency use.

Since 2018, this is the third consecutive specific exemption request from MDAR for the use of pronamide in cranberries to control dodder. The Interregional Project Number 4 (IR-4) has submitted a tolerance petition to the Agency to support a section 3 registration for this use. Therefore, progress towards registration is adequate at this time.

In the event MDAR requests an emergency exemption for this use next year, EPA is making a preliminary determination that this use is eligible for a streamlined application under the recertification program set forth at (40 CFR 166.20(b)(5)).

If you have any questions regarding this authorization, please contact Emergency Response Team member, Stacey Groce at (703) 305-2505; groce.stacey@epa.gov or Emergency Response Team Leader, Tawanda Maignan at (703) 308-8050; maignan.tawanda@epa.gov.

Marietta Echeverria, Acting Director
Registration Division
Office of Pesticide Programs

Date: ____ March 9, 2021 _____

cc: Robert Koethe, USEPA Region 1- Regional and Tribal Pesticide Coordinator