

Date: January 10, 1983

Subject: EPA File Symbol: 264-GCG
Weedone CB Abody Plant Herbicide

005141

From: Deloris F. Graham
JHB/ISS E 1/10/83

To: Richard Mountgaut
Product Manager (23)

Applicant: Union Carbide Agricultural Products Co., Inc.
P.O. Box 12014, J.W. Alexander Drive
Research Triangle, NC. 27709

Active Ingredients:

2-(2,4-Dichlorophenoxy) propionic acid, butoxyethanol ester	11.7%
2,4-Dichlorophenoxyacetic acid, butoxyethanol ester	11.9%
Inert Ingredients	76.4%

Background: Submitted Acute Oral, Acute Dermal,
Eye Irritation and Skin Irritation Studies. Data
under accession number 248956. Cite - All
method of support.

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Recommendation:

(1) JHB/ISS finds these data acceptable to
support conditional registration of this
product.

(2) An Acute Inhalation Study was not
submitted and one must be submitted
and/or cited.

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(3) The appropriate signal word is WARNING.

Label:

(1) Precautionary statements must precede directions for use. 005141

(2) The precautionary statements must be revised to include the following statement, "Causes eye irritation".

(3) The storage and disposal statements must appear under the heading "Directions For Use", sub heading "Storage and Disposal".

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Review:

(1) Acute Oral Toxicity Study: Union Carbide; Project Report #45-138; August 9, 1982.

Procedure: 3 groups consisting of 5M and 5F rats each received one of the following doses: 1.25, 2.5 and 5.0 ml/kg. Observations made frequently on the day of dosing and twice daily thereafter for 14 days. Necropsy performed on all animals.

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Results: At 2.5 ml/kg, 4/5M and 3/5F died; at 5.0 ml/kg, 4/5M and 5/5F died. Toxic signs observed included sluggishness, incoordination.

pelvic infection and discharge from mouth, nose and genital areas. Necropsy revealed red lungs, dilated stomach and liquid-filled intestines. LD50 for males was 2.10 ml/kg (2030 mg/kg). LD50 for females was 2.33 ml/kg (2250 mg/kg).

Study Classification: Low Toxicity Data.

Toxicity Category: III - CAUTION

(2) Acute Normal Toxicity Study: Chloroacetaldehyde; Project Report #45-138; August 9, 1982.

Procedure: 5M and 5F rabbits received 2.0 ml/kg of the test material at abraded skin sites under occlusive dressings for 24 hours. Observations made frequently on the day of dosing and twice daily thereafter for 14 days. Necropsy performed on all animals.

Results: 15M died on day 14. Erythema, edema and erythema ~~observed~~ observed. No other toxic signs noted. Necropsy of the 15M rabbit that died revealed lungs, mottled, depressed and pink, one lobe adhered to rib cage, containing capillary material. The lungs of the animals sacrificed revealed trachea with red patches and lines with apparent coagulation. LD50 greater than 2.0 ml/kg (1930 mg/kg).

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Study Classification: Low Toxicity Data.

Toxicity Category: II - HARMFUL

(3) Eye Irritation Study: Chloroacetaldehyde; Project Report #45-138; August 9, 1982.

Procedure: Three rabbits received 0.1 ml of the test material in one eye each. One rabbit

reps of three of the rabbits were treated with tuberculin under 50 to 50 seconds after treatment. Observations made at 1, 2, 3, 4 and 7 days after treatment.

Results: No animal reacting, or even irritation. At 24 hours $\frac{1}{6}$ animals of the untreated group and $\frac{1}{6}$ animals of the treated group had conjunctival redness ($\frac{1}{6}=1$) ($\frac{1}{3}=1$). Redness had cleared by 48 hours.

Study Classification: Case Schedule Data.

Toxicity Category: III - CHILLON

(4) This Limitation Study: Union Carbide; Report #45-138; August 9, 1932.

Procedure: Six rabbits received 0.5 ml. of the test material at 24 hours and 24 hours later. For 24 hours pre-exposure under observation. Observations made at 24 and 72 hours after treatment. Additional observations made at 6, 7, 8, 9 and 10 days after treatment.

Results: At 24 hours $\frac{1}{6}$ had erythema ($\frac{1}{6}=2$, $\frac{1}{6}=3$, $\frac{1}{6}=4$) and edema ($\frac{1}{6}=1$, $\frac{1}{6}=2$, $\frac{1}{6}=3$). At 72 hours, $\frac{1}{6}$ had erythema ($\frac{1}{6}=2$, $\frac{1}{6}=3$, $\frac{1}{6}=4$) and edema ($\frac{1}{6}=2$, $\frac{1}{6}=3$, $\frac{1}{6}=4$). Presumably irritation under was 4.65. Irritation persisted through day 9, but had cleared by day 10.

Study Classification: Case Schedule Data.

Toxicity Category: II - CHILLON

(PROPOSED LABEL)

WEEDONE® CB
Woody Plant

Herbicide

FOR CONTROLLING WOODY PLANTS IN FENCEROWS, ON ROADSIDES, RAILROADS,
UTILITY RIGHTS-OF-WAY AND OTHER NON-CROP AREAS.

ACTIVE INGREDIENTS:

2-(2,4-Dichlorophenoxy)propionic acid, butoxyethanol ester* 11.7%
2,4-Dichlorophenoxyacetic acid, butoxyethanol ester** 11.9%

INERT INGREDIENTS 76.4%

*2-(2,4-Dichlorophenoxy)propionic acid equivalent 8.2% by weight or
0.66 pounds per gallon.***

** 2,4-Dichlorophenoxyacetic acid equivalent 8.2% by weight or 0.66
pounds per gallon.***

***Isomer specific by AOAC method No. 6-D01-5.

EPA Reg. No.

EPA Est No. 264-MO-1

Keep Out Of Reach of Children

WARNING

See Other Precautions On Side Panel

IN CASE OF EMERGENCY
PHONE COLLECT (24 HOURS A DAY)
IN U.S.A. (304) 744-3487

©UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.

P. O. Box 12014, T.W. Alexander Drive, Research Triangle Park, N.C. 27709

GENERAL INFORMATION

WEEDONE® CB Woody Plant Herbicide is a ready-to-apply formulation for controlling unwanted woody plants by basal, stump or stem application. WEEDONE CB Woody Plant Herbicide is applied directly to the woody plant stem; it is not necessary to cut or frill the bark. WEEDONE CB Woody Plant Herbicide will not freeze under normal storage or application conditions, so it can be applied during the growth period or in the dormant season.

For most efficient treatment with WEEDONE CB Woody Plant Herbicide use the nozzles and spray equipment suggested in the Directions For Use.

During the growing season, vegetation near treated stems may be discolored and even killed. WEEDONE CB Woody Plant Herbicide is not persistent in soil, allowing ground cover plants to become reestablished in the treated area.

Species controlled by WEEDONE CB Herbicide include:

chestnut oak	ironwood (<u>Ostrya</u>)
red oak	ironwood (<u>Carpinus</u>) (blue beech)
white oak	American elm
bur oak	red elm
water oak	hackberry
pin oak	sour orange
black oak	redcedar
bear (scrub) oak	persimmon
red maple*	spruce
ash*	Sassafras
sweetgum	tallowtree
blackgum	sumac
hickory	aspen
birch	black locust
white pine	pin cherry
balsam fir	black cherry*
Virginia pine*	mazzard cherry*
southern pines*	choke cherry
red pine	poison ivy
sycamore	Ailanthus
	osageorange

*Treat at least lower 36 inches of stem as specified in Directions For Use.

DIRECTIONS FOR USE
GENERAL CLASSIFICATION

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

FOR CONTROL OF WOODY PLANTS IN FENCEROWS, ON ROADSIDES, RAILROADS,
UTILITY RIGHTS-OF-WAY AND OTHER NON-CROP AREAS

Average application volume of WEEDONE CB Woody Plant Herbicide is 5 gallons per acre, although actual amount used will depend on the amount and size of brush in the treated area. Total spray volume should be approximately 10% of that required for a conventional basal treatment. Do not exceed a total application volume of 20 gallons WEEDONE CB Woody Plant Herbicide per acre.

BASAL BARK TREATMENT:

To control general mixed brush up to 4 inches DBH (trunk diameter at breast height) including oak, hickory, sweetgum, blackgum, and many others, apply WEEDONE CB Woody Plant Herbicide undiluted to the lower 18-24 inches of the plant stem. Treat all around the stem including the root collar area and any exposed roots. It is not necessary for WEEDONE CB Woody Plant Herbicide to run down or puddle in the root collar area.

To control conifers larger than 2 inches DBH, or cherry, ash and maple, increase treatment height to cover the lower 36 inches of stem bark.

WEEDONE CB Woody Plant Herbicide basal bark treatment will control top growth of root-suckering species such as aspen, sumac, Sassafras, persimmon and black locust, but regrowth from lateral roots may occur the following growing season.

STUMP TREATMENT:

Control stems larger than 4 inches DBH, by cutting the tree, leaving an 18-24 inch tall stump and treating the sides and root collar area of the remaining stump.

If other oil-miscible woody plant herbicides are mixed with WEEDONE CB Woody Plant Herbicide to increase the spectrum of species controlled, do not exceed the ratio of 1 quart per 3 quarts WEEDONE CB Woody Plant Herbicide. Mix

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herbicide with WEEDONE CB Woody Plant Herbicide thoroughly before application. Contact Union Carbide Agricultural Products Company, Inc. for information concerning the use of WEEDONE CB Woody Plant Herbicide with other herbicides

GENERAL CAUTIONS:

Be sure that use of this product conforms to all applicable laws, rules and regulations. Certain states have restrictions pertaining to application distances from susceptible crops. The applicator should become familiar with these laws, rules or regulations and follow them exactly. Apply this product only as specified on this label.

Do not dilute WEEDONE CB Woody Plant Herbicide with water. Do not apply WEEDONE CB Woody Plant Herbicide when stems are wet. Rainfall which follows application of WEEDONE CB to dry stems does not normally reduce brush control.

Do not apply when weather conditions favor drift. Do not use the same spray equipment for other purposes unless thoroughly cleaned. Do not contaminate water used for domestic or irrigation purposes. Do not use in or near a greenhouse. Do not apply WEEDONE CB Woody Plant Herbicide directly to or permit spray mist to drift onto cotton, okra, grapes, tomatoes, fruit trees, vegetables, flowers, or other desirable crop or ornamental plants which are susceptible to 2,4-D or 2,4-DP herbicides. Do not apply near susceptible plants since very small quantities of the 2,4-D or 2,4-DP will cause severe injury during the growing or dormant periods. Crops contacted by WEEDONE CB Woody Plant Herbicide sprays or spray drift may be killed or suffer significant stand loss with extensive quality and yield reduction.

Drift may be reduced by: (1) applying as near to the target as possible; (2) by decreasing the pounds of pressure at the nozzle tips; (3) by using nozzles which produce a coarse spray pattern; (4) by not applying when wind is blowing toward susceptible crops or valuable plants.

Do not graze meat or dairy animals on treated area.

APPLICATION EQUIPMENT

WEEDONE CB Woody Plant Herbicide can be applied from a hand pump back pack sprayer or a hand-carried pump-up pressurized sprayer such as Solo 425, or Chapin Model 152.

For most efficient use of the spray mixture, apply with a gun such as the Spraying Systems Model 23L-7676 equipped with a Spraying Systems 5500 Y series adjustable ConeJet nozzle. Equip all nozzles with a 200 mesh screen.

An alternate system which will reduce but not eliminate dripping between trigger releases is a 200 mesh TeeJet strainer and check valve number 4193A-SS having a spring opening that operates at 10 psi with the Spraying Systems 5500 Y series adjustable ConeJet nozzle mounted on a conventional basal spray wand.

Since WEEDONE CB Woody Plant Herbicide is applied as a concentrate, the most efficient nozzle size will vary with the diameter of the brush stems to be treated:

- For average brush of 1-3 inches DBH, or for heavy stands of brush with most stems less than 1 inch DBH use the Spraying Systems 5500 adjustable ConeJet nozzle with a Y2 orifice.

- For scattered stands or large trees or brush use the Spraying Systems 5500 adjustable ConeJet nozzle with a Y3 orifice.

Spray pressure of 15 psi is optimum for most use. Do not use spray pressure higher than 20 psi.

Precautionary Statements

Hazard to Humans and Domestic Animals

WARNING

Harmful if swallowed. Causes skin irritation. Do not get on skin or clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly before eating or smoking.

Statement of Practical Treatment

In case of skin contact, wash with plenty of soap and water. Get medical attention if irritation develops.

In case of eye contact, flush with plenty of water.

If swallowed, drink promptly large quantities of milk, egg white, gelatin solution or if these are not available, drink large quantities of water.

Avoid alcohol. Get medical attention.

Do not induce vomiting.

Do not give anything by mouth to an unconscious person.

Environmental Hazards

This product is toxic to fish. Do not apply directly to water.

Do not contaminate water by cleaning of equipment or disposal of wastes.

Do not graze meat or dairy animals on treated area.

Storage and Disposal Statements

Do not contaminate water, food, or feed by storage or disposal.

Do not store near fertilizers, seeds, insecticides, or fungicides.

Pesticides, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable federal, state, or local procedures.

Container Disposal

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by other approved state and local procedures.

(Limited warranty and Disclaimer to be placed here)

WEEDONE is a registered trademark of Union Carbide Agricultural Products Company, Inc.

ConeJet and TeeJet are registered trademarks of Spraying Systems Company.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description of the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such direction; and (c) that the directions, warnings and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of residues, and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to, and the Buyer shall be solely responsible for, any and all loss or damage which results from the use of this product in any manner which is inconsistent with the label directions, warnings or cautions.

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