

228-316

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Mr. George Meindl  
Nufarm Americas, Inc.  
150 Harvester Drive  
Burr Ridge, IL 60527

JUL - 1 2010

Subject: Supplemental Label : Add aquatic use sites  
Product Name: Turflon II Amine  
EPA Reg. No.: 228-316  
Decision No.: 431999

Dear Mr. Meindl:

The supplemental labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided the following changes are made to the product labeling:

Make revisions to the supplemental label as listed below:

1. Remove "chemigation" from the list of application methods in the Spray Drift Management section as it conflicts with the restriction on application through irrigation systems.

Make revisions to the main product label as listed below:

1. For pastures, rangelands, fencerows and right-of-ways, add the following restrictions per the Triclopyr RED:  
"Limited to 1 application per growing season."  
"14-day pre-harvest interval (PHI) for grass hay"  
"3-day pre-slaughter interval"  
"Do not allow lactating dairy animals to graze on grass forage until the next growing season."
2. Remove the following restrictions from the "Use Precautions" section:  
"Do not apply to open water such as lakes, reservoirs..."  
"Do not apply more than 2 broadcast applications per year per treatment site." (this conflicts with the Triclopyr "1 application per growing season" restriction listed above for sites that could be grazed.

Continued on page 2

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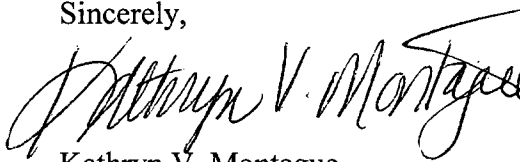
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3. Add "Limited to 2 applications per year with a 21-day minimum interval." to the Ornamental Turf and Sod Farm restrictions section.
4. Revise "General Information" to "Product Information"
5. Revise "Use Precautions" to "Use Restrictions and Precautions"
6. Remove "chemigation" from the list of application methods in the Spray Drift Management section as it conflicts with the restriction on application through irrigation systems.

At your next label printing, or within eighteen months of the date of this letter, whichever comes first, you must incorporate this supplemental labeling into the main product labeling.

A stamped copy of the label is enclosed for your records. Please submit one copy of your final printed label before you release the product for shipment.

Sincerely,



Kathryn V. Montague  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

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**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated:

JUL - 1 2010

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

228-316

## SUPPLEMENTAL LABELING

# Turflon<sup>®</sup> II Amine EPA Reg. No. 228-316

READ AND FOLLOW THE ENTIRE LABEL BOOKLET FOR TURFLON II AMINE BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING. "Label" as used in this supplemental labeling refers to the label booklet for this product and this supplemental.

APPLICATION DIRECTIONS FOR THE CONTROL OF EMERGENT, FLOATING AND SUBMERGED AQUATIC WEEDS IN THE FOLLOWING AQUATIC SITES: PONDS, LAKES, RESERVOIRS, MARSHES, BAYOUS, NON-IRRIGATION CANALS AND DITCHES, SEASONAL IRRIGATION CANALS AND DITCHES WHICH HAVE LITTLE OR NO CONTINUOUS OUTFLOW and IMPOUNDED RIVERS AND STREAMS THAT ARE QUIESCENT OR SLOW MOVING.

### DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN ANY MANNER INCONSISTENT WITH ITS LABELING.

This label must be in the possession of the user at the time of application.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS IN THE PRODUCT LABEL BOOKLET MUST BE FOLLOWED, INCLUDING STATEMENTS PERTAINING TO THE WORKER PROTECTION STANDARDS, ON THE EPA REGISTERED LABEL.

### Spray Drift Management

Avoiding spray drift at the application site is the responsibility of the applicator. A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial, airblast, chemigation) can influence pesticide drift. The applicator must evaluate all factors and make appropriate adjustments when applying this product.

Do not apply under circumstances where spray drift may occur to food, forage or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

If applying at wind speeds less than 3 mph, the applicator must determine if a) conditions of temperature inversion exists or 2) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversion or stable atmospheric conditions.

Applicators must follow all state and local pesticide drift requirements regarding application of 2,4-D and triclopyr herbicides. Where states have more stringent regulations, they must be observed.

### Use Restrictions for Aquatic and Wetland Sites

Notice to Applicators:

Before application, coordination and approval of local and state authorities may be required, either by letter or agreement or issuance of special permits for aquatic applications.

**Use Requirements for Aquatic Areas:**

When this product is applied to aquatic areas, follow PPE and reentry instructions in the "Non-Agricultural Use Requirements" section of this label.

Do not apply to salt water bays or estuaries.

Do not apply where runoff water may flow onto agricultural land as injury to crops may result.

Do not apply to unimpounded rivers and streams.

Do not apply to 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 triclopyr or less and 100 ppb 2,4-D or less.

**Recreational Use of Water in Treatment Areas**

There are no restrictions on the use of treated water for fishing . Do not swim in water treated with this product for (3) hours after treatment.

**Livestock Use of Water from Treatment Areas**

There are no restrictions on consumption of treated water for potable use by livestock, pets or other animals.

**CONTROL OF WEEDS AND BRUSH ON BANKS OF NON-IRRIGATION CANALS AND DITCHES**

**Application Rate**

Apply 44 to 88 ounces of this product per acre to control annual weeds

Apply 88 ounces of this product per acre for control of biennial and perennial weeds and susceptible woody plants

**Specific Use Directions**

Apply using low pressure spray (10 to 40 psi) in a spray volume of 20 to 100 gallons per acre using power operated spray equipment.

Apply when wind speed is low, 5 mph or less.

Apply working upstream to avoid accidental concentration of spray into water. Cross-stream spraying to opposite banks is not permitted and avoid boom spraying over water surface. When spraying shoreline weeds, allow no more than 2 foot overspray onto water surface with an average of less than 1 foot of overspray to prevent significant water contamination.

Apply when weeds are small and growing actively before the bud stage. Apply when biennial and perennial species are in the seedling to rosette stage and before stalks appear. For hard to control weeds, a repeat application after 30 days at the same rate may be needed.

For woody species and patches of perennial weeds, mix 1 gallon of this product per 64 to 150 gallons of total spray. Wet foliage by applying about 3 to 4 gallons of spray per 1000 sq ft (10.5 x 10.5 steps).

#### **Restrictions and Limitations**

Do not apply more than 2 treatments per season or reapply within 30 days.

Use 2 or more gallons of spray solution per acre.

Do not apply more than 92 oz/acre (2.0 lb of 2,4-D acid equivalent) per application or more than 184 oz/acre (4.0 lb of 2,4-D acid equivalent) per use season.

Do not use on small canals with a flow rate less than 10 cubic feet per second (CF) where water will be used for drinking purposes. CFS may be estimated by using the formula below. The approximate velocity needed for the calculation can be determined by observing the length of time that it takes a floating object to travel a defined distance. Divide the distance (ft.) by the time (sec.) to estimate velocity (ft. per sec.). Repeat 3 times and use the average to calculate CFS. Average Width (ft.) x Average Depth (ft.) x Average Velocity (ft. per sec.) = CFS

For ditchbank weeds, do not spray cross-stream to opposite bank. Do not allow boom spray to be directed onto water.

For shoreline weeds, boom spraying onto water surface must be held to a minimum and allow no more than 2 foot overspray onto water with an average of less than 1 foot overspray to prevent introduction of greater than negligible amounts of chemical into the water.

**CONTROL OF EMERGENT AND FLOATING AQUATIC WEEDS:** Including Water Hyacinth (*Eichomia crassipe*) and Alligatorweed (*Alternanthera philoxeroides*)

#### **SPECIFIC USE DIRECTIONS FOR EMERGENT AND FLOATING AQUATIC WEEDS**

##### **Application Sites**

Ponds, Lakes, Reservoirs, Marshes, Bayous, Drainage Ditches, non-irrigation Canals, impounded Rivers and Streams that are Quiescent or Slow Moving, including Programs of the Tennessee Valley Authority

##### **Application Rate**

Apply 88 to 175 oz of this product per acre

##### **Application Timing**

Spray weed mass only. Apply when water hyacinth plants are actively growing. A second application may be made 21 days after the initial application to kill regrowth and plants missed in previous operation. Use 175 oz/acre rate when plants are mature or when weed mass is dense.

##### **Surface Application**

Use power operated sprayers with boom or spray gun mounted on boat, tractor or truck. Thorough wetting of foliage is essential for maximum control. Use 100 to 400 gallons of spray mixture per acre. Special precautions such as use of low pressure, large nozzles and spray thickening agents should be taken to avoid spray drift to susceptible crops. Follow label directions for use of any drift control agent.

**Aerial Application**

Use drift control spray equipment or thickening agent mixed in the spray mixture. Apply 175 oz of this product per acre using standard boom systems using a minimum spray volume of 5 gallons per acre. For Microfoil (r) - drift control spray systems, apply this product in a total spray volume of 12 to 20 gallons per acre. Refer to the "Spray Drift Management" section.

**Restrictions and Limitations for Surface Applications to Emergent Aquatic Weeds**

Fish breathe dissolved oxygen in the water and decaying weeds also use oxygen. When treating continuous, dense weed masses, it may be appropriate to treat only part of the infestation at a time. For example, apply the product in lanes separated by untreated strips that can be treated after vegetation in treated lanes has disintegrated. During the growing season, weeds decompose in a 2 to 3 week period following treatment. Waters having limited and less dense weed infestations may not require partial treatments. Other local factors such as water exchange and sediment load can also influence the dissolved oxygen level. Coordination and approval of local and state authorities may be required, either by letter of agreement or issuance of special permits for aquatic applications.

Do not exceed 184 oz/acre (4.0 lb of acid equivalent) per surface acre per use season. Limited to 2 applications per season.

Do not make a broadcast application within 21 days of previous broadcast application. Spot treatments are permitted.

**CONTROL OF SUBMERGED AQUATIC WEEDS: Including Water Milfoil (*Myriophyllum spicatum*)**

**SPECIFIC USE DIRECTIONS FOR EMERGENT AND FLOATING AQUATIC WEEDS**

**Application Sites**

Ponds, Lakes, Reservoirs, Marshes, Bayous, Drainage Ditches, non-irrigation Canals, impounded Rivers and Streams that are Quiescent or Slow Moving, Including Programs of the Tennessee Valley Authority

**Application Rate**

Apply up to 3.88 gallons (10.8 lb of acid equivalent) per acre foot.

This product contains 2.78 lbs of 2,4-D acid equivalent and 1.07 lbs of triclopyr acid equivalent per gallon of product.

**Application Timing**

Apply in spring or early summer when aquatic weeds appear. Check for weed growth in areas heavily infested the previous year. A second application may be needed when weeds show signs of recovery, but no later than mid-August in most areas.

**Surface Application**

Use power operated boat mounted boom sprayer. If rate is less than 5 gallons per acre, dilute to a minimum spray volume of 5 gallons per surface acre.

**Subsurface Application**

Apply this product undiluted directly to the water through a boat mounted distribution system. Shoreline areas should be treated by subsurface injection application by boat to avoid aerial drift.

Apply to attain a concentration of 2 to 4 ppm 2,4-D and 0.75 to 1.5 ppm triclopyr (see table below).

**Amount of 2,4-D and Triclopyr to Apply for a Target Subsurface Concentration**

2,4-D ae ppm Triclopyr ae ppm	2	2.5	3	3.5*	4*
ppm	0.75	1.0	1.2	1.3*	1.5*
avg depth(ft)	Turflon 2 Amine gallons per surface acre at specified depth				
1	1.9	2.4	2.9	3.4	3.9
2	3.9	4.9	5.8	6.8	7.8
3	5.8	7.3	8.7	10.2	11.7
4	7.8	9.7	11.7	13.6	15.5
5	9.7	12.1	14.6	17.0	19.4

\* For difficult conditions, for example, spot treatment of pioneer colonies of Eurasian Water Milfoil and certain difficult to control aquatic species

**Aerial Application**

Use drift control spray equipment or thickening agents mixed with sprays to reduce drift. Apply through standard boom systems in a minimum spray volume of 5 gallons per surface acre. For Microfoil (r) drift control spray systems, apply this product in a total spray volume of 12 to 20 gallons per acre. Refer to the "Spray Drift Management" section.

**Restrictions and Limitations for Aquatic Sites with Submersed Weeds**

Do not exceed 10.8 lbs. 2,4-D acid equivalent and 6.9 lbs triclopyr acid equivalent per acre foot.

Fish breathe oxygen in the water and a water-oxygen ratio must be maintained. Decaying weeds use up oxygen, but during the period when applications should be made, the weed mass is fairly sparse and the weed decomposition rate is slow enough that the water-oxygen ratio is not disturbed by treating the entire area at one time. If treatments must be applied later in the season when the weed mass is dense and repeat treatments are needed, apply product in lanes, leaving buffer strips which can then be treated when vegetation in treated lanes has disintegrated. During the growing season, weeds decompose in a 2 to 3 week period following treatment.

Do not apply within 21 days of previous application. Limited to 2 applications per season.

When treating slow moving bodies of water, applications must be made while traveling upstream to prevent concentration of 2,4-D and triclopyr downstream from the application.

**WATER USE**

**Drinking water (potable water)**

**POTABLE WATER INTAKE SETBACKS FOR CONTROL OF SUBMERGED WEEDS – LAKES, RESERVOIRS, OR PONDS**

Minimum setback distances from functioning potable water intakes for human consumption for the application of this product must be observed when controlling submerged weeds in lakes, reservoirs or ponds.

Drinking water setback distances do not apply to terrestrial applications made adjacent to water bodies with potable water intakes.

Existing potable water intakes that are no longer in use, such as those replaced by a connection to a municipal water system or a potable water well, are not considered to be functioning potable water intakes.

Consult with appropriate state or local water authorities before applying this product to public waters. State or local agencies may require permits. The potable water use restrictions on this label are to ensure that consumption of water by the public is allowed only when the concentration of triclopyr in water is less than 400 ppb and the concentration of 2,4-D in water is less than the MCL (Maximum Contaminant Level) of 70 ppb. Applicators should consider the unique characteristics of the treated waters to assure that the triclopyr and 2,4-D concentrations in potable water do not exceed 400 ppb and 70 ppb, respectively, at the time of consumption.

For submersed weed applications, the drinking water setback distances from functioning potable water intakes are provided in the following table.

<b>Drinking water setback distance for submersed weed applications</b>				
<b>Application concentration and minimum setback distance (ft) from functioning potable water table intake</b>				
2,4-D ae ppm triclopyr ae ppm	≤ 0.5	0.6 to 1	1.1 to 2	2.1 to 4
	≤ 0.2	0.2 to 0.4	0.5 to 0.7	0.8 to 1.5
	600	1200	1800	2400

If no setback distance from the above Drinking Water Setback Distance Table is to be used for the application, applicators or the authorizing organization must provide a drinking water notification and an advisory to shut off all potable water intakes prior to a 2,4-D application. Notification to the party responsible for a public water supply or to individual private water users must be done in a manner to assure that the party is aware of the water use restrictions when this product is applied to potable water. The following is an example of a notification via posting, but other methods of notification which convey the above restrictions may be used and may be required in some cases under State or local law or as a condition of a permit.

**Example:** Posting notification should be located every 250 feet including the shoreline of the treated area and up to 250 feet of shoreline past the application site to include immediate public access points. Posting should include the day and time of application.

Posting may be removed if analysis of a water sample collected at the intake shows that the concentration of triclopyr in water is 400 ppb or less and the 2,4-D is 70 ppb or less, or after 21 days following application, whichever occurs first. Use the *Sampling for Drinking Water Analysis After 2,4-D Application for Submersed Weed Applications Table* below to determine the minimum numbers of days to wait between application and water sampling for a given application target concentration.

**Text of notification:** Wait 21 days before diverting functioning surface water intakes from the treated aquatic site to use as drinking water, unless water at functioning drinking water intakes is tested and is demonstrated by assay to contain triclopyr concentrations of 400 ppb or less and concentrations of 2,4-D of 70 ppb or less. Use the *Sampling for Drinking Water Analysis After 2,4-D Application for Submersed Weed Applications Table* above to determine the minimum numbers of days to wait between application and water sampling for a given application target concentration.

Application Date: \_\_\_\_\_ Time: \_\_\_\_\_



A. Following each application of this product, treated water must not be used for drinking water unless one of the following restrictions has been observed:

- i. A setback distance described in the Drinking Water Setback Distance Table was used for the application, or
- ii. A waiting period of 21 days from the time of application has elapsed, or,
- iii. An approved assay indicates that the concentration of triclopyr is 400 ppb or less and the concentration of 2,4-D is 70 ppb or less at the water intake. Sampling for drinking water analysis should occur no sooner than stated in *Sampling for Drinking Water Analysis After 2,4-D Application for Submersed Weed Applications Table* above. Analysis of samples must be completed by a laboratory that is certified under the Safe Drinking Water Act to perform drinking water analysis using a currently approved version of analytical Method Number 515, 555, other methods for 2,4-D as may be listed in Title 40 CFR, Part 141.24, or Method Number 4015 (immunoassay of 2,4-D) from U.S. EPA Test Methods for Evaluating Solid Waste SW-846.

3. Except as stated above, there are no restrictions on using water from treated areas for fishing or watering livestock.

Coordination and approval of local and state authorities may be required, either by letter of agreement or issuance of special permits for aquatic applications.

	Minimum days after application before initial water sampling at the functioning potable water intake		
2,4-D ae ppm	≤ 0.5	0.6 to 2	2.1 to 4
triclopyr ae ppm	≤ 0.2	0.3 to 0.7	0.8 to 1.5
	5	10	14

Note: These are general guidelines; the amount of time required for residues to reach concentrations acceptable for drinking or irrigation will depend on the total acres treated relative to water body size, application rates, water exchange rates, weed density, and various other factors.

### WATER USE Irrigation Purposes

**Irrigation:**

Do not use water treated with the product for irrigating greenhouse or nursery plants unless the triclopyr and 2,4-D residues are confirmed to be less than 1 ppb by laboratory analysis

Do not use water treated with this product for irrigating hydroponic crops

Do not apply under circumstances where spray drift may occur to food, forage or other plantings that might be damaged or crops thereof rendered unfit for sale, use or consumption. Susceptible crops include, but are not limited to, cotton, okra, flowers, grapes (in growing stage), fruit trees (foliage), soybeans (vegetative stage), ornamentals, sunflowers, tomatoes, beans, and other vegetables or tobacco. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants.

Do not use treated water for irrigation for 120 days following application or until residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

There is no restriction on use of water from the treatment area to irrigate established grasses. Do not apply this product through any type of irrigation system.

**Seasonal Irrigation Waters:**

This product 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 applying this product and the first use of treated water for irrigation purposes, or until residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

**Irrigation Canals/Ditches:**

Do not apply this product to irrigation canals/ditches unless the 120 day restriction on irrigation water usage can be observed or residue levels are determined by laboratory analysis, or other appropriate means of analysis, to be 1.0 ppb triclopyr or less and 100 ppb 2,4-D or less.

**NOTICE**

Read the WARRANTY DISCLAIMER AND LIMITATION OF LIABILITY in the label booklet for Turflon II Amine before using this product. Those terms apply to this supplemental labeling and if those terms are not acceptable, return the product unopened at once.

**Manufactured By Nufarm Americas Inc.  
150 Harvester Drive  
Burr Ridge, IL 60527**

Turflon is a trademark of Dow AgroSciences, LLC.