

Reg # 264-222

PM-23

L. A. Abeling

179



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

DEC 2 1993

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RHONE-POULENC AG COMPANY
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OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/20/93 In Response to PR Notice 93-7
EPA Reg. No. 264-222
WEEDONE 170 WOODY PLANT HERBICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



Recycled/Recyclable
Printed with SoyCanada ink on paper that
contains at least 50% recycled fiber

299

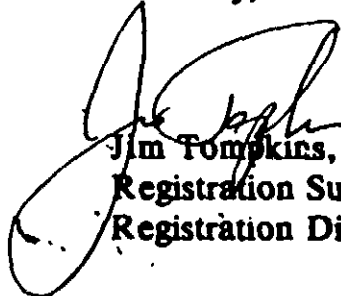
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)

Attachment

399

WEEDONE 170 WOODY PLANT HERBICIDE
EPA Reg. No. 264-222

Add the statement: "Remove PPE Immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing." to the User Safety Recommendations

WEEDONE[®] 170 Woody Plant Herbicide

Contains The Butoxyethanol Ester Of 2,4-DP And 2,4-D. For Controlling Mixed Brush on Utility Rights-Of-Way, Along Highways And Solid Stands Of Oak Or Elm.

ACTIVE INGREDIENTS: *2-(2,4-Dichlorophenoxy)propionic acid, butoxyethanol ester29.3%
**2,4-Dichlorophenoxyacetic acid, butoxyethanol ester29.9%
INERT INGREDIENTS:40.8%

*2-(2,4-Dichlorophenoxy)propionic acid equivalent 20.6% by weight or 1.85 pounds per gallon

**2,4-Dichlorophenoxyacetic acid equivalent 20.6% by weight or 1.85 pounds per gallon.

Isomer Specific by AOAC Method No. 6.D01-5

EPA Reg. No. 264-222ZB

EPA Est. No. 264-MO-01

KEEP OUT OF REACH CHILDREN CAUTION

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 1-800-334-7577
For PRODUCT USE Information Call 1-800-334-9745

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: If patient is conscious and alert, give 2 to 3 glasses of water to drink. Do not induce vomiting. Get medical attention.

IF ON SKIN: Wash skin with plenty of soap and water, if available, while removing contaminated clothing and shoes. Wash contaminated clothing separately before reuse.

IF IN EYES: Hold eyelids open and flush with a steady gentle stream of water for at least 15 minutes. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Administer oxygen if necessary. Get medical attention.

NOTE TO PHYSICIAN

No specific antidote is available. All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.

This product contains petroleum distillates. If large amounts (greater than 1 mL/kg body weight) of the product have been ingested, the stomach should be evacuated by gastric intubation with the aid of a cuffed endotracheal tube to prevent aspiration of petroleum distillates. After removal of stomach contents, wash stomach by instilling 30 to 50 grams of activated charcoal in 3 to 4 ounces of water through the stomach tube and again remove stomach contents. Avoid oily laxatives.

PRECAUTIONARY STATEMENTS

CAUTION

HAZARD TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed or absorbed through skin. Avoid breathing vapors or spray mist. Do not get in eyes, on skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

~~When mixing, loading or applying this product or repairing or cleaning equipment used with this product,~~ Applicators and other handlers must wear: long-sleeved shirt and long pants, chemical resistant gloves such as barrier laminate or butyl rubber or nitrile rubber or viton, shoes plus socks and protective eye wear (face shield or safety glasses).

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d) (4-6)), the handler PPE (personal protective equipment) may be reduced or modified as specified in the WPS.

For containers over 1 gallon but less than 5 gallons, persons engaged in pouring of this product must also wear coveralls or chemical-resistant apron. For containers of 5 gallons or more, a mechanical transfer system (probe and pump) must be used for transferring the contents of the container. If the contents of a non-refillable pesticide containers are emptied, the probe must be rinsed before removal.

USER SAFETY RECOMMENDATIONS

Users should: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ACCEPTED
with COMMENTS
In EPA Letter Dated

DEC 2 1993

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

264-222ZB

ENVIRONMENTAL HAZARDS

This product is toxic to fish and aquatic invertebrates. Drift or runoff may adversely affect fish, aquatic invertebrates and non-target plants. Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from treated areas. Do not allow livestock to graze treated areas. Do not use in or near a greenhouse. Do not contaminate water used for domestic or irrigation purposes.

MIXING AND LOADING: Most cases of ground water contamination involving phenoxy herbicides such as 2,4-D or 2,4-DP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D or 2,4-DP pesticides at such sites to prevent contamination of ground water supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent ground water contamination.

CLEANING OF EQUIPMENT: Do not use the same spray equipment for other purposes unless thoroughly cleaned. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply WEEDONE® 170 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® 170 sprays or spray drift may be killed or suffer significant stand loss with extensive quality and yield reduction.

Do not apply when a temperature air inversion exists. Such a condition is characterized by little or no air movement and an increase in air temperature with an increase in height. In humid regions a fog or mist may form. An inversion may be detected by producing a smoke column and checking for a layering effect. If questions exist pertaining to the existence of an inversion, consult with local weather services before making an application.

Use coarse sprays to minimize drift. Do not apply with hollow cone-type insecticide or other nozzles that produce fine spray droplets.

Drift from aerial or ground applications may be reduced by (1) applying as near to the target as possible in order to obtain coverage; (2) by increasing the volume of spray mix per acre; (3) by decreasing the pounds of pressure at the nozzle tips; (4) by using nozzles which produce a coarse spray pattern; (5) by not applying when wind is blowing toward susceptible crop or valuable plants.

At high air or ground surface temperature, vapors from the product may injure susceptible plants.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
Read entire label before using this product.

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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specified instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is: coveralls, chemical-resistant gloves such as barrier laminate or butyl rubber or nitrile rubber or viton, shoes plus socks and protective eye wear.

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food or feed by storage or disposal. Store in original container in a dry secured storage area. Keep container tightly closed when not in use.

PESTICIDE DISPOSAL

Open dumping is prohibited. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law and may contaminate ground water. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional office for guidance.

CONTAINER DISPOSAL

Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If container is burned, stay out of smoke.

MIXING INSTRUCTIONS

Add 1/2 the required amount of oil or water to the spray tank, then add this product with agitation and finally the balance of the water or oil with continued agitation.

If this material is to be used in straight oil mixtures, do not let water get into it or the finished mixture.

This material forms an emulsion in water, not a solution. This tends to separate on standing. Provide agitation to prevent such separation and ensure a uniform mixture.

GENERAL INFORMATION

WEEDONE® 170 Woody Plant Herbicide is a concentrated 50-50 combination of 2,4-D and 2,4-DP as the low-volume butoxyethanol ester.

WEEDONE® 170 Woody Plant Herbicide is specifically designed for utilities and other industrial users to control woody plants.

WEEDONE® 170 Woody Plant Herbicide mixes with oil or kerosene and emulsifies in water.

WEEDONE® 170 Woody Plant Herbicide controls many noxious perennial weeds on uncropped land, such as along highways, drainage ditchbanks and fence rows.

GENERAL WEED LIST		
alder	fir	red maple
aspen	gooseberry	salmonberry
bigleaf maple	hemlock	sand shinnery oak
birch	honeysuckle	serviceberry
blackberry	manzanita	snowberry
black cherry	multiflora rose	spruce
blackjack oak	oaks	sycamore
buckbrush	pine	tulip poplar
black locust	poison ivy	willow
ceanothus	poison oak	winged elm
chamise	poplar	yerba santa
coffeeberry	red elder	(and many other species)
currant	red elm	

FOLIAGE STEM METHOD

This is the standard method for high volume sprays along fencerows, highways and rights-of-way. Use it as a first spray on thick brush composed of mixed species.

Apply spray to both foliage and stems of all plants from the time foliage is fully developed until plants begin to go dormant. For effective control, all leaves, stems, and suckers must be thoroughly wet to ground line. Some regrowth may be expected on resistant species, such as ash, maple, oak and persimmon.

Add 1 to 1 1/2 gallons of WEEDONE® 170 to 100 gallons of water. Mix thoroughly before spraying. Use 200 to 600 gallons of spray mixture per acre depending on height and density of brush.

SPOT TREATMENT

For spot spraying with backpack sprayers, mix 1 cup (8 ounces) of WEEDONE® 170 Woody Plant Herbicide with 5 gallons of water. Wet brush stems and foliage thoroughly.

BASAL BARK METHOD

Thoroughly wet the base and root collar of all stems until spray collects around the root collar at ground line. This spray may be applied in any season. Apply WEEDONE® 170 Woody Plant Herbicide with the basal bark method on scattered brush or as a second spray on species resistant to a first foliage spray.

Mix 3 to 4 gallons of WEEDONE® 170 Woody Plant Herbicide to 100 gallons of oil. Apply with low volume knapsack sprayer or power equipment. Concentration will depend on species present, volume of spray used, and season applied. Use a coarse spray to avoid drift.

MODIFIED BASAL METHOD

Drench the base of plants, then wet the lower 4/5 of remaining stems and leaves to run-off. Treat when brush is in full foliage. This method may be used where susceptible species have been controlled by prior sprays and resistant species such as maple and oak remain. Drenching the base of the plant and wetting all stems to run-off is essential for complete control.

Early Season Spraying

Add 1 to 1 1/2 gallons of WEEDONE® 170 to 10 gallons of diesel oil and mix thoroughly. Add this mixture to 89 gallons of water.

During Dry Weather Or The Latter Part Of Spray Season

Add 1 1/2 gallons of WEEDONE® 170 to 15 gallons of diesel oil and mix thoroughly. Add this mixture to 83 1/2 gallons of water. Agitate thoroughly before spraying, particularly if material is allowed to stand for more than one hour after mixing.

CUT SURFACE

Stump: This method can be used at any time of year, but it is more effective when applied as soon as possible after trees are cut. Spray the entire stump, particularly bark and exposed roots. A thorough drenching is essential for complete control.

Use this method after original or capital clearing. It is the first step toward a chemical brush control program on newly cleared highways and rights-of-way. Spray is most effective and economical on stumps 3 to 4 inches and larger.

Mix 3 to 4 gallons of WEEDONE® 170 Woody Plant Herbicide to 100 gallons of oil. Apply with low volume knapsack sprayer using a solid cone nozzle of medium orifice.

Concentrate Stump Treatment: For small (up to 3 inches diameter) stems, cut them as close to the ground as possible and apply undiluted WEEDONE® 170 directly from the can to the surface of the freshly cut stump.

Frill: Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark but do not remove chips. This method is recommended for cull trees 5 to 6 inches in diameter and larger. Treat freshly cut frills at any time of the year. Mix 3 to 4 gallons of WEEDONE® 170 Woody Plant Herbicide to 100 gallons of oil. Pour in as much of this mixture as the frill will hold without wasting.

POWERED KNAPSACK BASAL SPRAY

Mix 8 to 14 gallons of WEEDONE® 170 Woody Plant Herbicide with fuel oil or kerosene to make 100 gallons of spray solution. Apply with a portable knapsack mistblower to lower brush stems. Apply spray to all sides of stems; good root collar coverage is essential. Run knapsack mistblower at 1/4 to 1/3 throttle for best spray delivery and coverage. For maximum drift control use a basal nozzle attachment. Do not raise spray nozzle above horizontal position.

FENCEROW APPLICATION

To control mixed brush, perennial and annual broadleaf weeds, use one of the application methods such as the foliage stem method described on this label. Some regrowth may be expected on resistant species such as ash, maple, oak and persimmon.

LOW VOLUME STEM FOLIAGE SPRAY (Aerial Or Ground)

Apply the spray only through equipment designed to provide effective drift control. A helicopter mounted MICROFOIL® applicator or other equipment that provides equivalent drift control is recommended for aerial sprays. A DIRECTA-SPRA® or mini-wobbler is recommended for ground sprays.

SOLID STANDS OF OAK OR ELM

Apply with fixed-wing or helicopter aircraft. Apply in the spring after hardwoods have just developed full sized leaves. The spray season normally runs from early May to mid-June in Texas; and from early May to early July in Oklahoma and northward. Spray when wind velocities are less than 5 miles per hour.

AMOUNTS TO USE

BRUSH	WEEDONE® 170	OIL	ADD WATER TO MAKE A TOTAL
post, blackjack oak, winged elm	2/3 gallon	1 gallon	5 gallons
sand shinnery oak	1/2 to 1 quart	1 gallon	3 gallons

If necessary, repeat spray the second year with 1 quart of WEEDONE® 170 per acre. For maximum control, use higher rate and repeat spray the second year using 1 quart of WEEDONE® 170 per acre.

FORESTRY SITE PREPARATION

To reduce competition from mixed trees and brush before planting forest trees: Apply 1 gallon of WEEDONE® 170 Woody Plant Herbicide for easy to control species such as aspen, hazel, alder, sassafras, sumac, black locust, willow and other similar species. Apply 2 gallons of WEEDONE® 170 to control more difficult species such as oaks, sweet gum, black gum, hickory and tulip poplar.

Mix with water to make 10 gallons total solution when applying as an aerial spray or 20 gallons total solution when applying as a ground spray. Do not apply to established plantations as this spray mix will injure planted conifers.

PINE RELEASE

To control hardwood brush and release northern conifers such as red pine, Jack pine, white pine and white spruce: Apply 2 to 4 quarts of WEEDONE® 170 Woody Plant Herbicide as a broadcast spray in 10 gallons of water per acre. Make applications in mid-summer after pine height growth is complete and the conifer buds are set. WEEDONE® 170 will control aspen, birch, cherry, alder, hazel, oaks, and similar species.

WEEDONE® 170 will not, at these rates, provide satisfactory control of red maple, sugar maple or ash.

AERIAL OR GROUND APPLICATION TO CONTROL MIXED BRUSH (INCLUDING conifers and root suckering species on utility, railroad and highway rights-of-way, fencerows, and other non-crop areas.)

WEEDONE® 170 Woody Plant Herbicide And Tordon® Mixtures

Where red maple, conifers, and root-suckering species such as sassafras, sumac, black locust or persimmon are the major problem, use 1 to 2 1/2 gallons of WEEDONE® 170 in combination with 1 to 2 1/2 gallons of Tordon 101 Herbicide mixture or in combination with 3 to 6 pints of Tordon K Herbicide. Dilute with water and apply in a total spray volume of 15 to 50 gallons per acre. Use lower rates to control brush on sandy soils or coarse soils with susceptible species such as seedling aspen, cherry, willow and sumac. Use higher rates to control brush on clay soils or fine soils or rocky terrain with more resistant species such as maple, oak, pine and red cedar. When making the spray mixture, add WEEDONE® 170 Woody Plant Herbicide to the required amount of water while agitating the mixture in the spray tank. Then add the Tordon 101 or Tordon K while continuing agitation. Do not mix concentrates of WEEDONE® 170 with concentrates of Tordon 101 or Tordon K.

Aerial applications of the tank mixture should be made only with a helicopter mounted MICROFOIL® applicator or an equipment system providing equivalent drift control. Do not use these tank mixtures on drainage ditchbanks, or for site preparation in forest plantations.

Observe all restrictions, precautions and limitations on the labeling of each product used in tank mixtures.

**WEEDONE® 170 WOODY PLANT HERBICIDE AND BANVEL® HERBICIDE MIXTURES
HIGH VOLUME STEM FOLIAGE SPRAY**

Mix 1 to 1 1/2 gallons of WEEDONE® 170 with 1 to 2 quarts of Banvel 4WS per 100 gallons total spray mix. Use the low rate for easy to kill brush such as alder, aspen, cherry, sycamore, tulip poplar and willows. Use the high rate to control species such as oak, ash, elm, pines, spruce and fir.

LOW VOLUME STEM FOLIAGE SPRAY (Aerial Or Ground)

Mix 2 to 3 gallons of WEEDONE® 170 with 1 to 1 1/2 gallons of Banvel Herbicide in 15 to 50 gallons of water per acre to control mixed brush including conifers and ash.

Observe all restrictions, precautions and limitations on the labeling of each product used in tank mixtures.

929

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on 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 directions; 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 on food crops, 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.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

Banvel is a trademark of Sandoz Chemical Company.
Tordon is a trademark of DowElanco.

Rhône-Poulenc Ag Company
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Research Triangle Park, North Carolina 27709

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WEEDONE 170 Woody Plant Herbicide (PENDING) Submitted ___/___/___