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JUN 21 1985

Warren A. Davis  
Union Carbide Agricultural  
Products Company  
P.O. Box 12014, T.W. Alexander Drive  
Research Triangle Park, NC 27709

Dear Mr. Davis:

Subject: Add Drainage Ditch Banks  
Invert 171 Woody Plant Herbicide  
EPA Registration No. 264-223  
Your Submission of June 17, 1985

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A) is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. Modify "Keep out of lakes, streams or ponds" to read:

Do not apply directly to water.

b. In the warranty statement, delete references to "residues on food crops" since this product is registered only for non-food uses.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

CONCURRENCES

SYMBOL ▶								
SURNAME ▶								
DATE ▶								

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,

*RFS*  
for Richard F. Mountfort  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (TS-767)

Enclosure

RD/FHB-JOB:89484:RD-09:Kendrick:898-1270:6/20/85:Del,7/2/85:ab

ACCEPTED  
with comments  
JUN 21 1985  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended for the pesticide  
registered under  
EPA Reg. No. 264-223

ENVERT 171®

WOODY PLANT HERBICIDE

AN "INVERT EMULSION" FORMULATION OF 2,4-D AND 2,4-DP. CONTROLS MIXED BRUSH ON UTILITY RIGHTS-OF-WAY, ROADSIDES, DRAINAGE DITCHBANKS, AND SIMILAR AREAS.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE OTHER CAUTIONS ON RIGHT SIDE PANEL.

ACTIVE INGREDIENTS:

- \*2,4-Dichlorophenoxyacetic acid, butoxyethanol ester . . . . . 16.8%
- \*\*2-(2,4-Dichlorophenoxy) propionic acid, butoxyethanol ester . . . . . 19.5%

INERT INGREDIENTS:

- . . . . . 63.7%
- \*2,4-Dichlorophenoxyacetic acid equivalent 11.6% by weight  
or 0.95 pound per gallon.  
Isomer specific by AOAC method No. 6.D01-5
- \*\*2-(2,4-Dichlorophenoxy) propionic acid equivalent 13.7% by weight  
or 1.125 pounds per gallon.

IN CASE OF EMERGENCY TELEPHONE 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, NC 27709

EPA Reg. No. 264-223

EPA Est. No. 264-MO-01

## PRECAUTIONARY STATEMENTS

### CAUTION

#### HAZARD TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Avoid contact with skin, eyes or clothing.

#### STATEMENT OF PRACTICAL TREATMENT

In case of contact wash skin with soap and water; for eyes flush with water for at least 15 minutes and get medical attention.

#### ENVIRONMENTAL HAZARDS

This product is toxic to fish. Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water used for irrigation or domestic purposes. Do not apply when weather conditions favor drift from treated areas. Do not use in or near a greenhouse. Do not use same spray equipment for other purposes.

#### DIRECTIONS FOR USE

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

Do not apply ENVERT 171 directly to, or allow 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. Very small quantities of the 2,4-D or 2,4-DP can cause severe injury during the growing or dormant periods. At temperatures above 95°F vapors from ENVERT 171 may injure susceptible plants.

Drift from aerial application may be reduced by (1) applying as near to the target as possible in order to obtain coverage; (2) by applying 12 or more gallons of spray per acre; (3) by using 20 pounds pressure or less at the nozzle tips; (4) by using nozzles which produce a coarse spray pattern; (5) by spraying only when the wind velocity is less than 5 miles per hour; and (6) by spraying when there is no possibility for a temperature inversion at time of spraying.

Use coarse sprays to minimize drift. Do not apply with hollow cone-type insecticide or other nozzles that produce fine spray droplets. Drift from ground application may be reduced by: (1) keeping spray as near to target as possible in order to obtain complete coverage; (2) by using no more than 20 pounds of pressure at the nozzle tips; and (3) by not spraying when the wind exceeds 5 miles per hour.

Do not apply near cotton, grapes, tomatoes or near desirable 2,4-D or 2,4-DP susceptible crop or ornamental vegetation.

Local conditions may affect the use of herbicides. Consult your State Agriculture Experiment Station, Farm Advisors, or Extension Weed Specialists for advice in selecting treatment from this label to best fit local conditions.

Be sure that use of the 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.

#### STORAGE AND DISPOSAL

##### STORAGE

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

##### PESTICIDE DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. 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 by other procedures approved by state and local authorities.

Consult Federal, state or local disposal authorities for approved alternate procedures.

#### LIMITED WARRANTY AND DISCLAIMER

**BEST AVAILABLE COPY**

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.

**DIRECTIONS: Air or Ground Application**

APPLY through UNION CARBIDE'S SPRA-DISK® or other suitable equipment, mounted on a helicopter, or through a ground mechanical inverter system, such as the Wanner sprayer.

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To control mixed brush on utility rights-of-way, roadsides, drainage ditchbanks and similar areas, especially where conifers are a problem, spray in the spring after hardwoods have developed full sized leaves but before the spring growth of conifers has hardened off.

Where root suckering species such as sumac, sassafras, locust, and black gum predominate, mix 3 gallons of ENVERT 171 with 9 gallons of water for each acre to be sprayed.

Where harder to control species such as red maple, elm or oaks are present, mix 5 to 6 gallons of ENVERT 171 with 15 to 18 gallons of water for each acre to be sprayed.

WHERE BRUSH IS VERY DENSE AND TALL (25' to 30') or where conifers are present, better results will be obtained by increasing the rate and volume to 10 gallons of ENVERT 171 in 30 gallons of water per acre.

Always add water to ENVERT 171; never the reverse.

Aerial spraying of ENVERT 171 is a specialized job. Only employ competent, reliable aerial applicators who have qualified technical guidance. Become familiar with state laws governing the application of herbicides. Do not apply ENVERT 171 in areas where possible drift may injure valuable crops or plants (See Caution Statements).

**GENERAL INFORMATION**

ENVERT 171 provides an effective woody plant herbicide in a "invert emulsion" form.

When mixed properly, ENVERT 171 makes an "invert emulsion," a thicker, more viscous spray mixture than standard water, oil or oil-water mixtures used in aerial or ground spraying.

### MIXING DIRECTIONS

Add the proper amount of ENVERT 171 to the mixing tank. While agitating, add the required amount of water. Always add water to ENVERT 171, never the reverse. Mechanical paddle agitators that operate independently of the pump should be used. Re-circulate through the by-pass valves until the thick emulsion is obtained. To transfer the spray mixture from mixing tanks to aircraft tanks, use a positive displacement pump with 1-1/2 to 2 inch hose fittings on both the suction and discharge end.

