

DOW CHEMICAL U.S.A.

9008 Building November 18, 1987 P.O. 80X 1706 MIDLAND, MICHIGAN 48640

Robert J. Taylor, PM-25 Registration Division, OPP (TS-767) Environmental Protection Agency Room 245, Crystal Mall No. 2 1921 Jefferson Davis Highway Crystal City, Arlington, VA 22202 I RELATED DO In Accordance with FR Ration 12 I Tribuling Batul 5/15/84

Dear Mr. Taylor:

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Subject: TURFLON* II Amine Herbicide EPA Registration No. 464-606 Your letters of May 15, 1986, May 29, 1986, and November 10, 1987

Please note that the statement "Femove and wash contaminated clothing before reuse" was deleted from the Statements of Practical Treatment on the first printing of the subject label submitted May 19, 1986. It was not deleted from the section on Hazards to Humans and Domestic Animals. You did not in your original letter request that it be deleted from both places. Dow Chemical has this statement somewhere on most of its herbicide labels. We believe it is a prudent requirement. We respectfully request that we be allowed to leave this statement on the subject label.

We did not get the word "mucosal" correct on our first printing. That word is now correct in our submission of September 18, 1987. We are not aware of any other problems with the labeling submitted September 18, 1987.

We request permission to continue use of this label.

Sincerely,

Alici H. Morgan

Alice H. Morgan / Product Registration Manager Agricultural Products Department 517/636-2312

Attachment

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*Trademark of The Dow Chemical Company



AN OPERATING UNIT OF THE DOW CHEMICAL COMPANY

Specimen Label

NOT REVIEWED In Accordance with PR Notice 82-2. Based on Draft Labeling Dated

Turflon^{*} II Amine Herbicide

For the Control of Annual and Perennial Broadleaf Weeds in Ornamental Turf

Active Ingredient(s):

E.P.A. Est. 464-MI-1

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2,4-D (2,4-Dichlorophenoxyacetic acid) as the dimethylamine salt	. 34.2%
Triclopyr (3,5,6-trichloro-2-pyridinyloxyacetic acid) as the triethylamine salt	. 15.2%
Inert Ingredients	. 50.6%
2,4-D acid equivalent 28.4% - 2.78 lb/gal	
Triclopyr acid equivalent 10.9% - 1.07 lb/gal	-

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO: PRECAUCION AL USUARIO:

E.P.A. Registration No. 464-606

Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals CAUSES IRREVERSIBLE EYE DAMAGE • MAY BE FATAL IF ABSORBED THROUGH SKIN • HARMFUL IF SWALLOWED OR INHALED

Avoid Breathing Vapors • Do Not Get In Eyes, On Skin, Or Clothing • Wear Goggles Or Face Shield And Rubber Gloves When Handling • Wash Thoroughly With Soap And Water After Handling And Before Eating Or Smoking • Remove Contaminated Clothing And Wash Before Reuse

STATEMENT OF PRACTICAL TREATMENT: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes and get medical attention promptly. Flush skin with water and get medical attention if signs of irritation develop. If swallowed, promptly drink a large quantity of milk, egg whites, getatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Call a physician.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate use of gastric lavage. Physical or Chemical Hazards

Do Not Cut or Weld Container.

Environmental Hazards

Keep out of lakes, streams or ponds. Do not contaminate water by cleaning of equipment or disposal of wastes.

NOTICE

Read the entire label. Use only according to label directions. Before buying or using this product, read "WARRANTY LIM-ITATIONS AND DISCLAIMER" elsewhere on this tabel. If terms are not acceptable, return **unopened** package at once to seller for full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under "WARRANTY LIMITATIONS AND DIS-CLAIMER."

IN CASE OF AN EMERGENCY

endangering life or property involving this product, call collect 517-636-4400

or Clothing

See Side Panel for Important Use Precautions

GENERAL INFORMATION

TURFLON II Amine Herbicide is a broad-spectrum weed killer for control of broadleaf weeds in ornamental turf.

DIRECTIONS FOR USE

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

Do not apply this product through any type of irrigation system.

APPLICATION RATES					
Weeds Controlled		Rate 'Acre	Rate: 1000 sq. fl.		
Black med c Carpel weed Carpel weed Chan-se Chan-se Chackweeds Chackey <i>Eurquelo</i> 1 Clovers Cocklebur Coffeeweed Contrower Coffeeweed Contrower Creeping beggarweed Dandelion Dayflower Opcks Dwart beggarweed Field b-indweed	Goldentus Henbit Hop Clover Knawe! Lamtsquarter Lespedeza Litte starwart Matchweed Plantain Purstane speedwe': Smartweed Sowthistle Spiderwort Spotted catsear Sputweed Vetch Yatrow	2-12 pints	1 oz or 2 Tbsp		
Burdeck Buttercup Mustards	Poison ivy Poison bak Wild carrot	3 to 3-1 2 pints	1 3 oz or 2-1 2 Tbsp.		
Comspeedacil Ground wy Oxalis (stricta and com-curata	Parsley-piert Prostrate spurge Wild violet	3 pints, 2 applications 4 to 6 weeks apart	1 3 oz or 2-1 2 Tbsp. 2 applications 4 to 6 weeks apart		

Application Directions

Foliage sprays should be applied during warm weather when weeds are actively growing. Application under concept conditions may provide less than desirable results. Use new spray pressures to minimize spray drift.

Apply TURFLON II Amine in a manner to avoid contacting nearby susceptible crops or other desirable plants. Very small amounts of spray drift may injure susceptible plants. DO NOT apply to exposed roots of shallow rooted trees or shrubs.

Broadcast Treatment of Ornamental Turf: Apply 1 to 2 quarts of TURFLON II Amine in enough water to make 35 to 175 gallons total spray per acre to control broadleaf weeds growing in perennial bluegrass, tall fescue, or perennial ryegrass. DO NOT use on other grass species unless injury can be tolerated. Apply from early spring through fall when

- weeds are actively growing. Broadleaf weed species germinate at different times. Only emerged weeds present at time of application are controlled. Additional applications should be
- riade four weeks apart to minimize grass injury. Newly seed-
- ed lurf should be mowed two or three times before being treated. Do not water for 24 hours after application. Do not
- reseed for 5 weeks after application.
- Sprayers: Mix 1 to 2 Iluid ounces of TURFLON II Amine in
- enough water to make 3 gallons of spray (1 to 2 quarts per 100 gallons of solav) and apply at any time broadleaf weeds are
- susceptible by welting foliage of undesirable plants to point of , runoff,

... Preparing the Spray

 Add about one-half the desired amount of clean water to spray lank. Add TUBFLON II Amine and complete addition of water with agitation running. Mix thoroughly and continue moderate agitation while spraying

USE PRECAUTIONS

Apply this product only as specified on this label.

Do not apply TURFLON II Amine directly to, or otherwise permit it to come into direct contact with, cotton, grapes, tcbacco, vegetable crops, flowers, fruit or ornamental trees, or other desirable broadleaf plants and do not permit spray mists containing it to drift onto them.

DO NOT apply to exposed roots of shallow rooted trees and shrubs.

Avoid Injurious Spray Drlft, Applications should be marie only when hazards from spray drift are at a minimum. Very small quantities of spray, which may not be visible, may senously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured.

With ground broadcast equipment, drift can be reduced by keeping the spray boom as low as possible; by applying no less than 32 gallons of spray per acre; by using no more than 20 pounds spraying pressure with flat fan or flooding flat fan nozzle tips; and by spraying when wind velocity is less than 5 miles per hour.

In handgun applications drift can be reduced by using low pressure Teejet flat fan, Raindrop or other drift controlling nozzles. Standard flat fan nozzles may also be used at no more than 20 psig. At this pressure the spray pattern may be narrower.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. STORAGE: Store above 28°F or agitate before use

DISPOSAL:

Pesticide Disposal: 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. Plastic containers, after triple rinsing, may be incinerated if allowed by state and local authorities. If burned, stay out of smoke.

General: Consult federal, state, or local disposal authorities lor approved alternative procedures.

Be sure that use of this product conforms to all applicable regulations.

WARRANTY LIMITATIONS AND DISCLAIMER

The Dow Chemical Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions therein under normal conditions of use. THIS IS THE ONLY WARRANTY MADE ON THIS PRODUCT NO OTHER EXPRESS AND NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE OUTSIDE OF THIS LABEL Therefore, neither this warranty nor any other warranly of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), under abnormal conditions (such as excessive rainfall, drought, lornadoes, hurricanes, etc.) or under conditions not reasonably foreseeable to or beyond the control of seller.

When buyer or user suffers tosses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict hability, or other legal theories), buyer or user must promptly notify in writing The Dow Chemical Company of any claims to be eligible to receive either remedy given below. The EXCLUSIVE REMEDY OF THE BUYER OR USER and the LIMIT OF LIABILITY of The Dow Chemical Company or any other seller will be one of the following, at the election of The Dow Chemical Company.

(1) Retund of purchase price paid by buyer or user for product bought, or

(2) Replacement of amount of product used

The selier will not be liable for consequential or incidental damages or losses.

The terms of this Warranty Limitations And E sclaimer cannot be varied by any written or verbal statements or agreements Any employee or sales agent of the seller is not authorized to vary or exceed the terms of this Warranty Limitations And Disclaimer in any manner

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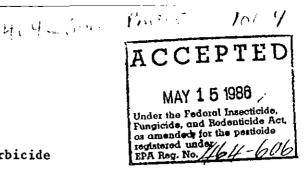
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THE DOW CHEMICAL COMPANY Midland, Michigan 48674 U.S.A.

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TURFLON* II Amine Herbicide

For the Control of Annual and Perennial Broadleaf Weeds in Ornamental Turf

Active Ingredients:

2,4-D (2,4-dichlorophenoxyacetic acid) as the dimethylamine salt.....34.2% Triclopyr (3,5,6-trichloro-2-pyridinyloxyacetic acid) as the triethylamine salt......15.2%

EPA Reg. No. 464-

KEEP OUT OF REACH OF CHILDREN

DANGER PELIGRO:

PRECAUCION AL USUARIO: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUSES IRREVERSIBLE EYE DAMAGE. MAY BE FATAL IF ABSORBED THROUGH SKIN. HARMFUL IF SWALLOWED. Do not get in eyes, on skin, or clothing. Wear Goggles or Face Shield and Rubber Gloves When Handling. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT: In case of contact, immediately flush eyes with planty of water for at least 15 minutes and gat medical attention promptly. Flush skin with water and gat medical attention if signs of irritation develop. Remove and wash contaminated clothing before reuse. If awailowed, promptly drink a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician.

*Trademark of The Dow Chemical Company

EPA Est. 464-MI-1

Physical or Chemical Hazards

Do Not Cut or Weld Container

Environmental Hazards

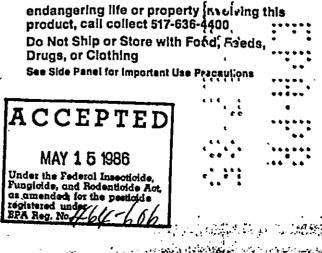
Keep out of lakes, streams or ponds. • Do not contaminate water by cleaning of equipment or disposal of wastes.

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IN CASE OF AN EMERGENCY



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GENERAL INFORMATION

TURFLON II Amine Herbicide is a broad-spectrum weed killer for control of broadleaf weeds in ornamental turf.

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DIRECTIONS FOR USE

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

Application Rates

Weeds Controlled		Rate/Acre	Rate/1000 sq ft
Black medic	Henbit	2-1/2 pints	1 oz or 2 Tbsp.
Carpet weed	Hop clover		
Catnip	Knawel		
Chamise	Lambsquarter		
Chickweeds	Lespedeza		
Chicory	Little starwart		
Cinquefoi1	Mallow		
Clovers	Matchweed		
Cocklebur	Plantain		
Coffeeweed	Purslane speedwell		
Cornflower	Smartweed		
Creeping beggarweed	Sowthistle		
Dandelion	Spiderwort		
Dayflower	Spotted catsear		
Docks	Spurweed		
Dwarf beggarweed	Vetch		
Field bindweed	Yarrow		
Goldenrod			
Burdock	Poison ivy	3 to 3-1/2 pints	1.3 oz or 2-1/2
Buttercup	Poison oak	_	Tbsp.
Mustards	Wild carrot		
			1.3 oz or
Cornspeedwell	Parsley-piert	3 pints,	2-1/2 Tbsps,
Ground ivy	Prostrate spurge	2 applications	2 applications
Oxalis (stricta and corniculata)	Wild violet	4 to 6 weeks apart	4 tc b weeks
Application Direction	10		· · · · · · · · · · · · · · · · · · ·
Apprecación dirección	<u>10</u>		çerere erçi

Foliage sprays should be applied during warm weather when weeds are actively growing. Application under drought conditions may provide less than desirable results. Use low spray pressures to minimize spray drift.

Apply TURFLON II Amine in a manner to avoid contacting nearby susceptible cropp or other desirable plants. Very small amounts of spray drift say injury susceptible plants. DO NOT spply to exposed roots of shallow rooted trees of shrubs.

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Proposed Label Copy Page 3 December 16, 1985

Broadcast Treatment of Ornamental Turf: Apply 1 to 2 quarts of TURFLON II Amine in enough water to make 35 to 175 gallons total spray per acre to control broadleaf weeds growing in perennial bluegrass, tall fescue, or perennial ryegrass. DO NOT use on other grass species unless injury can be tolerated. Apply from early spring through fall when weeds are actively growing. Broadleaf weed species germinate at different times. Only emerged weeds present at time of application are controlled. Additional applications should be made four weeks apart to minimize grass injury. Newly seeded turf should be mowed two or three times before being treated. Do not water for 24 hours after application. Do not reseed for 3 weeks after application.

Spot Treatment of Ornamental Turf Using Portable Sprayers: Mix 1 to 2 fluid ounces of TURFLON II Amine in enough water to make 3 gallons of spray (1 to 2 quarts per 100 gallons of spray) and apply at any time broadleaf weeds are susceptible by wetting foliage of undesirable plants to point of runoff.

Preparing the Spray

Add about one-half the desired amount of clean water to spray tank. Add TURFLON II Amine and complete addition of water with agitation running. Mix thoroughly and continue moderate agitation while spraying. Proposed Label Copy Page 4 December 16, 1985

STORAGE AND DISPOSAL

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

STORAGE: Store above ** * F or agitate before use.

DISPOSAL:

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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. Plastic containers, after triple rinsing, may be incinerated if allowed by state and local authorities. If burned, stay out of smoke.

General: Consult federal, state, or local disposal authorities for approved alternative procedures.

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DO NOT apply to exposed roots of shallow rooted trees and shrubs.

Avoid Injurious Spray Drift. Applications should be made only when hazards from spray drift are at a minimum. Very quantities of spray, small which may not be visible may seriously injure susceptible plants. Do not spray when wind 1.S blowing toward susceptible crops or ornamental plants near enough to be injured.

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In handgun applications drift can be reduced by using low pressure Teejet flat fan , Raindrop or other drift controlling nozzles. Standard flat fan nozzles may also be used at no more than 20 psig. At this pressure the spray pattern may be narrower.

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of Spraying Systems Co.

(2) Raindrop is a trademark of the Delavan Corp.

WARRANTY LIMITATIONS AND DISCLAIMER

The Dow Chemical Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions therein under normal conditions of use. THIS IS THE ONLY WARRANTY MADE ON THIS PRODUCT. NO OTHER EXPRESS AND NO IMPLIED WARRANTY OF MERCHANTABILITY OR FIT-NESS FOR A PARTICULAR PURPOSE IS MADE OUTSIDE OF THIS LABEL. Therefore, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), under abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes, etc.) or under conditions not reasonably foreseeable to or beyond the control of seller.

When buyer or user suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), buyer or user must promptly notify in writing The Dow Chemical Company of any claims to be eligible to raceive either remedy given below. The EXCLUSIVE REMEDY OF THE BUYER OR USER and the LIMIT OF LIABILITY of The Dow Chemical Company or any other seller will be one of the following, at the election of The Dow Chemical Company:

- Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product lysed.

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The seller will not be liable for consequential or incidents', a damages or losses.

The terms of this Limit of Warranty and Elablity cannot be , varied by any written or verbal statements of agreements. Any employee or sales agent of the seller is not authorized to vary or exceed the terms of this Warranty Limitations. And Disclaimer in any manner.

THE DOW CHEMICAL COMPANY

Midland, Michigan 48640 U.S.A.

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