UNITED STATED. DNASH

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

5.2008

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

159

JUL 25 2008

Dr. Alice Walker Agent for Winfield Solutions, LLC 3094 Country Club Road Senatobia, MS 38668

Subject: Label Notifications for Pesticide Registration Notice 2007-4

1381-203

Dear Dr. Walker,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated June 13, 2008 (and the revised label sent July 24, 2008) for the product Brash (EPA Registration Number 1381-202). The Registration Division (RD) has conducted its review of this request for its applicability under PRN 2007-4 and finds that the label changes requested fall within the scope of PRN 2007-4. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on <u>nonrefillable</u> containers. The code may appear either on the label (and can be added by nonnotification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please call me directly at 703-305-6249 or Steve Schaible of my staff at 703-308-9362.

Sincerely,

n

Linda Arrington Notifications & Minor Formulations Team Leader Registration Division (7505P) Office of Pesticide Programs

P.03

. . ....

2/29-

	Ur Environmental	nited States			F	Registra Amenda Other	tion	OPP Identifier Number
		Application	for Pesticio	le - Sect	ion I			
1. Company/Product Number 1381-202			2. EPA 5 Joanne	roduct Mana Miller	ger			None Restricted
4. Company/Product (Nama) Brash			PM# 23					
5. Neme and Address of App Winfield Solutions, LL 3094 Country Club Ro Senatobia, MS 38668	C, c/ວ Alice Walk I.		g (b)(i), m to: EPA R		s simili	ar or identi	ical in co	FIFRA Section 3(c)(3) mposition and labeling CATION 5 2008
			Section - I	l				
Amendment - Explein Resubmission in respo V Notification - Explein I	onse to Agency letter	dated		Final printed Agency lette "Me Too" A Other - Expl	er date pplicat	ion.	e to	
Confidential Statement of For further understand that if the in this product may be in violation 1. Material This Product Will	amenced label is not co on of FIFRA and I may b	insistent with the	requirements of 4	0 CFR §§ 152 d penaities ur	.48, 15	8.10, 156,14	40, 156.144	1, 156,146, and 156,156,
Child-Resistant Packaging	Unit Peckaging		Water Soluble P	ackening		2. Type of	Container	
Yas ✓ No	Yes ✓ No		Ves V				Motul Plastic Glass	
* Certification must be submitted	lf "Yes" Unit Paokaging wgt.	' No. par containar	if "Yes" Package wgt	No. per conteiner	, .		Peper Other (S	pecify)
3. Logation of Net Contents	Information	4. Size(s) Retain 1, 2.5	cell Container     5. Location of Lebel Directi       .5, 15, 30, 55 gallons     [] On (abe)				506	
6. Manner in Which Labul is	Affixed to Product	Lithogra Paper d Stencile	ph ued d	V Other	<u>sei</u>	adhesive	böcklet	n
· · · · · · · · · · · · · · · · · · ·	ىرىپىيە بۇلغارىي <u>تەرىكە تەتبىيە بەرىپىيە بەرىپىيە بەرىپىيە بەرىپىيە بەرىپىيە بەرىپىيە بەرىپىيە بەر</u>		Section - I	V			<del>ست الأثرة بن بريا غايك س</del>	
1. Contact Point (Complete	items directly below f	or identification	of individuel to b	e contected,	if nece	sary, to pi	rocess this	upplication.)
Nama Alice Walker, Ph.D.		1	Title Agent				Telephon 662-662-	e No. (include Area Code) 5995
i certify that the state I acknowledge that an both under applicable	ments i have made on y knowlingily false or law.	Certificati this form and a mislaading state	il attachments th	ereto are true hishable by fi	ne or ir	rete and co aprisonmer	mplete. It or	6. Date Application Received (Stamped)
2. Stonarufe	Valken		. Title Agent					
4. Typed Nama Alice Walker, Ph.D.		5	. Date Jur	ne 23, 200	08			

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

# NOTIFICATION

JUL 2 5 2008



# BRASH®

For use on Conservation Reserve Program Land, Fallow Systems (Between Crop Applications), General Farmstead, Sorghum, Grass (Hay or Silage), Pastures, Rangeland, Sugarcane, and Wheat

ACTIVE INGREDIENTS:	•
Dimethylamine salt of dicamba (3,6-dichloro-o-anisic acid)*	
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid**	
OTHER INGREDIENTS:	51.9%
TOTAL	

\*This product contains 10.3% 3,6-dichloro-<u>o</u>-anisic acid (dicamba) or 1 pound per gallon (120 g/L) \*\*This product contains 29.6% 2,4-dichlorophenoxyacetic acid (2,4-D) or 2.87 pounds per gallon (344 g/L). Isomer specific by AOAC method 978.05, 15<sup>th</sup> Edition

#### SHAKE WELL BEFORE USING

KEEP OUT OF REACH OF CHILDREN

# DANGER/PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

	FIRST AID
If in eyes:	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If swallowed:	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip a glass of water if able to swallow.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>Do not give anything by mouth to an unconscious person.</li> </ul>
lf on skin or clothing:	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a poison control center or doctor for treatment advice.</li> </ul>
If Inhaled:	<ul> <li>Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> </ul>
	container or label with you when calling a poison control center or doctor, or going for ay also contact 1-877-824-7452 for emergency medical treatment information.
Probable mucosa	NOTE TO PHYSICIAN I damage may contraindicate the use of gastric lavage.

See inside booklet for additional Precautionary Statements

EPA Reg. No. 1381-202

EPA Est. No.

Distributed By: Winfield Solutions, LLC P.O. Box 64589 St. Paul, MN 55164-0089

NET CONTENTS\_\_\_\_\_ LOT NO.\_\_\_\_\_ 0/0723/8

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Harmful if swallowed or absorbed through skin. Avoid contact with skin.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are butyl rubber  $\geq$  14 mils, or natural rubber  $\geq$  14 mils, or neoprene rubber  $\geq$  14 mils or nitrile rubber  $\geq$  14 mils. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.

All mixers, loaders, applicator, flaggers, and other handlers must wear:

- Long-sleeved shirt and long pants

- Chemical-resistant gloves (except for pilots)

- Shoes plus socks

- Protective evewear

- Chemical-resistant apron when mixing or loading, cleaning up spills or equipment, or otherwise exposed to the concentrate.

See engineering controls for additional requirements.

Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

#### **Engineering Controls Statements:**

When handlers use 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 requirements may be reduced or modified as specified in the WPS.

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)].

#### USER SAFETY RECOMMENDATIONS

Users should:

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

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

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.

#### ENVIRONMENTAL HAZARDS

This product may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment washwaters or rinsate.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow,

may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater 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 groundwater contamination.

#### 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 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.

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

#### 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 specific 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 worker entry into treated areas during the restricted entry interval (REI) of 48 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 worn over short-sleeve shirt and short pants, chemical-resistant gloves made of any waterproof material, chemical-resistant headgear for overhead exposure, chemical-resistant footwear plus socks, and protective evewear.

#### STORAGE AND DISPOSAL

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

#### PESTICIDE STORAGE

Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granules, sawdust, or equivalent material for disposal.

#### PESTICIDE DISPOSAL

Pesticide wastes are toxic. Triple rinse pesticide from containers and use rinsates in the pesticide application. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal Law and may contaminate groundwater. 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:** Use label language appropriate for container size and type.

**Nonrefillable container.** Do not reuse or refill this container. Clean container promptly after emptying. **Nonrefillable container equal to or less than 5 gallons.** Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip the flow begins to drip. Repeat this procedure two more times. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

Nonrefillable container greater than 5 gallons. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use of disposal. Repeat this procedure two more times. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

**Refillable container.** Refill this container with this pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

# FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure or accident, call CHEMTREC 1-800-424-9300.

#### GENERAL INFORMATION

BRASH<sup>®</sup> is a selective postemergence herbicide for controlling a wide spectrum of annual, biennial, and perennial broadleaf weeds and brush in grass forages and selected row crops. BRASH<sup>®</sup> may be used in/on Conservation Reserve Program Land\*, Fallow Systems (Between Crop Applications)\*, General Farmstead\*, Grain Sorghum, Grass (Hay or Silage), Pastures, Rangeland, Sugarcane, and Wheat. \*These crops are considered Food/Feed crops only when harvested, grazed or foraged. Otherwise, they are considered as non-Food/Feed uses.

**MODE OF ACTION:** BRASH<sup>®</sup> contains dicamba and 2,4-D as the active ingredients. BRASH<sup>®</sup> is readily absorbed by plants through shoot and root uptake, translocates throughout the plant's system, and accumulates in areas of active growth. BRASH<sup>®</sup> interferes with the plant's growth hormones (auxins) resulting in death of many broadleaf weeds.

**SPRAY EQUIPMENT CLEANING:** Spray equipment may be cleaned by using a strong detergent or commercial sprayer cleaner according to the manufacturer's directions and then triple rinsing the equipment before and after applying this product.

#### APPLICATION INSTRUCTIONS

Apply BRASH<sup>®</sup> at the recommended rates and growth stages in the **Annual Weeds** and the **Biennial** and **Perennial Weeds** rate tables unless instructed differently in the **Food/Feed Crop Specific Information** or **Non-Food/Feed Use-Specific Information** sections of this label. Make applications of BRASH<sup>®</sup> to actively growing weeds using aerial, broadcast, band, or spot spray applications. BRASH<sup>®</sup> may be applied using water or sprayable fluid fertilizer as a carrier. For preplant or pre-emergence uses, sprayable fluid fertilizer may be used as the carrier for all crops listed on this label. Postemergence applications with sprayable fluid fertilizer may be made on pasture, hayland, or wheat crops only.

The most effective application rate and timing varies based on the target weed species. In mixed weed populations, the correct rate is determined by the weed species requiring the highest rate. Inadequate control may be observed if application is delayed since weeds may exceed the maximum size stated on this label.

**IRRIGATION:** In irrigated areas, it may be necessary to irrigate before application of BRASH<sup>®</sup> to ensure active weed growth.

**SPRAY COVERAGE:** Ensure weeds are thoroughly covered with spray. Dense leaf canopies may shield smaller weeds and prevent adequate coverage.

#### SPRAY DRIFT MANAGEMENT

A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, and 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.

#### Droplet Size

When applying sprays that contain 2,4-D as the sole active ingredient, or when applying sprays that contain 2,4-D mixed with active ingredients that require a coarse or coarser spray, apply only as a coarse or coarser spray (ASAE standard 572) or a volume mean diameter of 385 microns or greater for spinning atomizer nozzles.

When applying sprays that contain 2,4-D mixed with other active ingredients that require a medium or more fine spray, apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

#### Wind Speed

Do not apply at wind speeds greater than 15 mph. Only apply this product if the wind direction favors ontarget deposition and there are not sensitive areas (including, but not limited to, residential areas, bodies of water, known habitat for non-target species, non-target crops) within 250 feet downwind. If applying a medium spray, leave one swath unsprayed at the downwind edge of the treated field.

#### **Temperature Inversions**

If applying at wind speeds less than 3 mph, the applicator must determine if:

a) conditions of temperature inversion exist, or

b) stable atmospheric conditions exist at or below nozzle height. Do not make applications into areas of temperature inversions or stable atmospheric conditions.

#### Susceptible Plants

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. These plants are most sensitive to BRASH<sup>®</sup> during their development or growing stage. Small amounts of spray drift that might not be visible may injure susceptible broadleaf plants. Agriculturally approved drift-reducing additives may be used. Do not use aerial equipment to apply BRASH<sup>®</sup> when sensitive crops and plants are growing in the vicinity of area to be treated. Do not treat areas where either possible downward movement into the soil or surface washing may cause contact of BRASH<sup>®</sup> with the roots of desirable plants such as trees and shrubs.

#### Other State and Local Requirements

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

5

່ງຊ

#### Equipment

All aerial and ground application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.

#### Additional requirements for aerial applications:

The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter. Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy unless a greater height is required for aircraft safety. This requirement does not apply to forestry or rights-of-way applications.

When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this by adjusting the path of the aircraft upwind.

Additional requirements for ground boom application:

Do not apply with a nozzle height greater than 4 feet above the crop canopy.

#### **AERIAL APPLICATION METHODS AND EQUIPMENT**

Water Volume: Use 3-10 gallons of water per acre. Use the higher spray volume when treating dense or tall vegetation.

#### **GROUND APPLICATION (BANDING)**

When applying BRASH<sup>®</sup> by banding, determine the amount of herbicide and water volume needed using the following formula:

Band width in inches	- <b>v</b>	Broadcast rate	=	Banding herbicide
Row width in inches	- ^	per acre	-	rate per acre
Band width in inches	- x	Broadcast volume	=.	Banding water
Row width in inches		per acre		volume per acre

#### **GROUND APPLICATION (BROADCAST)**

For optimal performance, use 5-40 gallons of spray solution per broadcast acre. Use the higher spray volume when treating dense or tall vegetation.

#### SPOT OR SMALL AREA APPLICATION

BRASH<sup>®</sup> may be applied to individual clumps or small areas (SPOT TREATMENT) of undesirable vegetation using handgun or similar types of application equipment. Apply diluted sprays to allow complete wetting (up to runoff) of foliage and stems. For knapsack or other small capacity sprayers, utilize the table below to calculate material needed. (The table below is based on the assumption that the spot treatment rate equates to 60 gallons per acre on the broadcast basis.)

#### **Knapsack Sprayer Dilution Instructions**

Sprayer Capacity	Fluid Ounces* of BRASH <sup>®</sup>				
(Gallons of water)	to add per filled tank				
1.0 gallon	1.0 oz				
2.5 gallons	2.5 oz				
3.0 gallons	3.0 oz				
5.0 gallons	5.0 oz				

The addition of a surfactant can help improve control. Add ½% (0.005) by volume. For example, 5 gallons (40 pt/640 fl oz) of herbicide solution would require 0.2 pt (3.2 fl oz) of surfactant.

\*1 fluid ounce = 2 tablespoons and 1 cup (liquid) = 16 tablespoons

#### ANNUAL WEEDS

#### Application Rate and Timing

Weeds Controlled		BRASH <sup>®</sup> Rat		according to v		
(including ALS- and	0.5	1 pint	1.5 pints	2 pints	3 pints	4 pints
triazine-resistant	pint					
Beebalm, Spotted				pre-bloom	post-bloom	
Broomweed	1-3"	3" branching		branching		after branching
Buckwheat, Wild		1-6"				
Buffalobur			·	1-6"		flowering
Burdock		pre-flower				
Buttercup		pre-flower		early bloom	late bloom	
Chickweed, Common		seedling	1-3"			
Cockle, Cow		< 3"	'			
Cocklebur, Common		1-6"	6-12"	12-18"		
Coreopsis, Plains		1-6"				
Croton, Woolly	1-4"	4-12"	12-30"			
Devilsclaw				< 8"		
Dogfennel	·		'	10-15"		
Evening Primrose		< 2"		2-6"		
Falseflax, Smallseed		< 2"				
Fleabane, Annual		1-4"	4-8"	8"		
Flixweed		<.3"				
Henbit			pre-flower		flower	
Knotweed, Spp.		< 3" runners		> 3" runners		actively growing
Kochia		1-6"	6-10"	10-20"		actively growing
Lambsquarters, Common		1-6"	6-10"	10-20"		actively growing
Mallow, Common		< 3"				
Morningglory, Ivyleaf		pre-flower				
, Tall		pre-flower		post-flower		
Mustards, Annual		rosette < 3"		early bolt		
, Tansy Pennycress, Field						
			 1-3"	rosette 3-6"		
Pepperweed, Virginia			1-3	3-0	after branching	
Pigweed, Prostrate		< 3"				
, Redroot		< 3"	3-10"			
, Smooth		< 3"				
, Tumble		< 3"		mature		
Poorjoe		prior to flower				actively growing
Purslane, Common		< 3"	3-8"			
Ragweed, Common , Lanceleaf , Western	1-3"	3-6"	6-10"	> 10"		
Sedge <sup>1</sup>	,			actively growing		
Shepherdspurse		rosette			·	
Smartweed, Pennsylvania		< 4"			4-12"	
Sneezeweed, Bitter		1-4"	prior to flower	flower		
Sowthistle		rosette		bolting		
Sunflower		1-3"	3-6"	6-24"		
Thistle, Russian				rosette		

7

Weeds Controlled	1	BRASH <sup>®</sup> Ra	te Per Acre (a	ccording to	weed growth s	tage)
(including ALS- and triazine-resistant	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 pints
Velvetleaf		< 6"	6-20"	> 20"		
<sup>1</sup> For use in non-food/feed growing annual sedge.	crop only.	Adding crop of	oil concentrate h	nas shown to in	mprove performa	ance on actively

#### **BIENNIAL and PERENNIAL WEEDS**

# Application Rate and Timing

	BRASH <sup>®</sup> Rate Per Acre (according to weed growth stage)							
Weeds Controlled	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 to 5.6 pints		
Bindweed, Field	·					actively growing		
Bittercress <sup>5</sup>		2-3"						
Buckeye, species <sup>1</sup>				'	full leaf			
Bulinettle <sup>2,5</sup>				flower				
Chicory					early bolting			
Clover, bur			pre-flower	· ••••				
Dandelion, Common		rosette		bolting				
Dewberry, Southern <sup>1</sup>						spring or fall		
Dock, Curly			prior to bolting		after bolting			
Elderberry <sup>2</sup>						actively growing		
Goldenrod, Missouri				3-15"	flower			
Goldenweed, Common						actively growing		
Groundsel, Texas		rosette	post-bolting					
Honeysuckle, Hairy					spring or fall			
Horsenettle, Carolina						flower or berry		
Ivy, Poison		'		after bloom				
Knapweed, Black <sup>2</sup>						actively growing		
, Russian <sup>2</sup>						actively growing		
, Spotted						actively growing		
Marshelder <sup>5</sup>				< 12"	12"/pre bloom			
Mesquite						45-90 days after bud- break		
Milkweed <sup>1, 5</sup>				pre-flower		flower		
Nightshade, Silverleaf				full flower				
Black				full flower		actively growing		
Persimmon, Eastern <sup>3</sup>						actively growing		
Prickly Lettuce				rosette		actively growing		
Rabbitbrush <sup>2</sup>						actively growing		
Ragwort, Tansy				rosette		actively growing		
Redvine <sup>2</sup>						actively growing		
Sagebrush, Fringed <sup>2</sup>						actively growing		
Smartweed	·					actively growing		
Sorrel, Red			rosette	bolting	flower	actively growing		
Sowthistle <sup>2</sup>				¥		actively growing		
Spurge, Leafy <sup>2</sup>						full leaf		
Tallow Tree, Chinese <sup>4, 5, 6</sup>						full leaf		
Thistle, Bull			rosette	bolting		actively growing		
, Canada <sup>2</sup>						actively growing		
, Musk				rosette/bolting				
, Plumeless			rosette	bolting				
Vetch, Hairy		1-4"	4-8"	8" full flower				
Yankeeweed				10-18"		rosette		

8

		BRASH®	Rate Per Acre	(according t	o weed gro	wth stage)
Weeds Controlled	0.5 pint	1 pint	1.5 pints	2 pints	3 pints	4 to 5.6 pints
Yellow Starthistle						rosette

May require repeat applications.

<sup>2</sup>Recommended rate provides top growth suppression only.

<sup>3</sup>For improved root kill or woody species such as mesquite and eastern persimmon, spray 4 pints of BRASH<sup>®</sup> per acre each year for 3 consecutive years. For increased control of weeds such as blackberry and dewberry, BRASH<sup>®</sup> may be tank mixed with Ally<sup>®</sup> herbicide (0.1-0.2 ounces per acre), if labeled for the use site.

<sup>4</sup>A second application may be required the following growing season under dense populations.

<sup>5</sup>Not for use in California.

<sup>6</sup>Treat with 4 pints of BRASH<sup>®</sup> per acre after full leaf but before leaves develop a heavy cuticle (waxy covering) in periods of extreme heat or drought stress.

#### ADDITIVES

For improved burndown of emerged weeds, surfactants and/or low use rate of liquid fertilizers (28-0-0, 32-0-0), or crop oil concentrate may be used with BRASH<sup>®</sup> or BRASH<sup>®</sup> tank mixes applied after weeds have emerged. Crop oil concentrate is for non-food/feed crop uses only. Do not apply to tank mixes that include ammonium sulfate or crop oil concentrate to any food/feed crop use listed on this label. For food/feed crop uses, do not use liquid fertilizers that contain ammonium sulfate (AMS) as a source of nitrogen as tolerances in commodities derived from the crop may contain residues that exceed established tolerances. Consult your local WINFIELD SOLUTIONS, LLC representative for recommendations for your area. For additional information, refer to the **Compatibility Test for Mix Components** section of this label.

#### Oil Concentrate

A crop oil concentrate must contain either a petroleum or vegetable oil base and must meet all of the following criteria: be nonphytotoxic, contain only EPA-exempt ingredients, provide good mixing quality in the jar test and be successful in local experience.

The exact composition of suitable products will vary; however, vegetable and petroleum oil concentrates should contain emulsifiers to provide good mixing quality. Highly refined vegetable oils have proven more satisfactory than unrefined vegetable oils. For additional information, refer to the **Compatibility Test for Mix Components** section of this label.

#### Mix Components

Adjuvants containing crop oil concentrates may be used for preplant, pre-emergence and between cropping applications. Do not use crop oil concentrate for postemergence applications in food/feed crops (i.e., sorghum, grass (hay or silage), pastures, rangeland, sugarcane and wheat).

#### Nitrogen Source

**Sprayable liquid fertilizers:** Use one quart of sprayable liquid fertilizers (28-0-0, 32-0-0) per acre. Do not use brass or aluminum nozzles when spraying fertilizers.

#### Nonionic Surfactant

The standard label recommendation is 2-4 pints of an 80% active nonionic spray surfactant per 100 gallons of water. For certain weeds, use a higher spray surfactant rate.

Additive Rate Per Acre					
Rate Per Acre					
2-4 pints per 100 gallons					
2-4 quarts					
1 quart*					

\*Refer to the manufacturer's label for specific rate recommendations.

#### GENERAL TANK MIXING INFORMATION

The following products may be tank mixed with BRASH<sup>®</sup> according to the specific tank mixing instructions in this label and the respective product labels.

Aim™ (carfentrazone-ethyl)	Gramoxone <sup>®</sup> Extra (paraquat)
Ally <sup>®</sup> (metsulfuron-methyl)	Harmony <sup>®</sup> Extra (thifensulfuron + tribenuron-
	methyl)
Amber <sup>®</sup> (triasulfuron)	Karmex <sup>®</sup> (diuron)
Asulox <sup>®</sup> (asulam)	Kerb™ (pronamide)
Atrazine	Laddok <sup>®</sup> S-12 (bentazon + atrazine)
Albaugh Dicamba DMA Salt or Banvel <sup>®</sup> (dicamba)	Landmaster <sup>®</sup> BW (glyphosate + 2,4-D)
Basagran <sup>®</sup> (bentazon)	MCPA
BROX™-M Herbicide or Bronate <sup>®</sup> (bromoxynil +	Paramount <sup>®</sup> (quinclorac)
MCPA)	
BROX <sup>™</sup> 2EC Herbicide or Buctril <sup>®</sup> (bromoxynil)	Peak <sup>®</sup> (prosulfuron)
Canvas <sup>®</sup> (thifensulfuron + tribenuron + metsulfuron)	Permit <sup>®</sup> (halosulfuron-methyl)
Clarity <sup>®</sup> (dicamba)	Rave™ (dicamba + triasulfuron)
Curtail™ (clorpyralid + 2,4-D)	Gly Star <sup>™</sup> Plus or Roundup <sup>®</sup> Ultra (glyphosate)
Cyclone <sup>®</sup> (paraquat)	Sencor <sup>®</sup> (metribuzin)
Dakota <sup>®</sup> (fenoxaprop-p-ethyl + MCPA)	Sinbar® (terbacil)
Distinct <sup>®</sup> (diflufenzopyr)	Stinger™ (clopyralid)
Evik <sup>®</sup> (ametryn)	Tiller <sup>®</sup> (fenoxaprop-p-ethyl + 2,4-D + MCPA)
Express <sup>®</sup> (thifensulfuron + tribenuron-methyl)	Tordon™ (picloram)
Fallow Star™ or Fallowmaster <sup>®</sup> (glyphosate +	Touchdown <sup>®</sup> (sulfosate)
dicamba)	
Finesse <sup>®</sup> (chlorsulfuron + metsulfuron-methyl)	2,4-D
Glean <sup>®</sup> (chlorsulfuron)	

Refer to the Food/Feed Crop-Specific Information section for additional information. Read and follow the applicable **Restrictions and Limitations** and **Directions For Use** on all products involved in tank mixing. The most restrictive labeling applies to tank mixes.

Crop injury, reduced weed control, or physical incompatibility may result when mixing BRASH<sup>®</sup> with other pesticides (fungicides, herbicides, insecticides, or miticides), additives, or fertilizers. Winfield Solutions, LLC does not recommend using tank mixes other than those listed on this labeling. Local agricultural authorities may be a source of information when using tank mix components other than those recommended on this label.

#### **Compatibility Test for Mixing Components**

Always perform a compatibility test before mixing components. For 20 gallons per acre spray volume, use 3.3 cups (800 mL) of water. For other spray volumes, adjust accordingly. Only use water from the intended source at the source temperature. Add components in the sequence indicated in the **Mixing Order** using 2 teaspoons for each pound or 1 teaspoon for each pint of recommended label rate per acre. Always cap the jar and invert 10 cycles between component additions.

When the components have all been added to the jar, let the solution stand for 15 minutes. Evaluate the solution for uniformity and stability. The spray solution should not have free oil on the surface, nor fine particles that precipitate to the bottom, nor thick (clabbered) texture. If the spray solution is not compatible, repeat the compatibility test with the addition of a suitable compatibility agent. If the solution is then compatible, use the compatibility agent as directed on its label. If the solution is still incompatible, do not mix the ingredients in the same tank.

10

ัวจ

#### Mixing Order

If an inductor is used, rinse it thoroughly after each component has been added. Maintain constant agitation during application.

- 1. Water\* Begin by agitating a thoroughly clean sprayer tank half full of clean water.
- 2. Agitation Maintain constant agitation throughout mixing and application.
- Products in PVA bags Place any product contained in water-soluble PVA bags into the mixing tank. Wait until all water-soluble PVA bags have fully dissolved and the product is evenly mixed in the spray tank before continuing.
- 4. Water-dispersible products (such as dry flowables, wettable powders, suspension concentrates, or suspo-emulsions).
- 5. Water-soluble products (such as BRASH<sup>®</sup>).
- 6. Emulsifiable concentrates (such as oil concentrate when applicable).
- 7. Water-soluble additives (such as liquid fertilizers (28-0-0, 32-0-0) when applicable).
- 8. Remaining quantity of water.

\*If sprayable fluid fertilizer is used as the carrier, BRASH<sup>®</sup> must be diluted with a minimum of 5 parts water to 1 part BRASH<sup>®</sup>. Then add 0.25-0.05% volume/volume of a nonionic surfactant to the dilution before adding it to the sprayable fluid fertilizer to reduce the concern for compatibility problems with this mix. Always perform the **Compatibility Test** before mixing into the spray tank. Also, when using a sprayable fluid fertilizer as the carrier, any product contained in PVA bags must first be completely dissolved in water before the contents can be added to the fertilizer mix.

#### **RESTRICTIONS AND LIMITATIONS**

Livestock Grazing or Feeding <sup>1</sup>	Aircraft Application
Yes	Yes
	Feeding <sup>1</sup> Yes         Yes         Yes         Yes         Yes         Yes

#### Preharvest Interval (PHI): Refer to the Food/Feed Crop-Specific Information section of this label.

#### Crop Rotational Restrictions:

The interval between application and planting rotational crop is provided below. Always exclude counting days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.

- Planting/replanting restrictions for BRASH<sup>®</sup> applications of 5.66 pints per acre or less: No rotational cropping restrictions apply at 120 days or more following application. Additionally, for annual crop uses in this label including sorghum, follow the preplant use directions in the Food/Feed Crop-Specific Information section of this label. For barley, oat, wheat, and other grass seedlings, the interval between application and planting is 10 days per pint per acre.
- Planting/replanting restrictions for application of more than 6 pints and up to 8 pints of BRASH<sup>®</sup> per acre: Corn, sorghum, cotton (east of the Rocky Mountains) and all other crops grown in areas with 30" or more of annual rainfall may be planted 120 days or more after

application. Barley, oat, wheat, and other grass seedlings, may be planted if the interval from application to planting is 10 days per pint per acre east of the Mississippi River and 15 days per pint per acre west of the Mississippi River. For all other crops in areas with less than 30" of annual rainfall, the interval between application and planting is 180 days or more.

- **Rainfast period:** The effectiveness of BRASH<sup>®</sup> may be reduced if rainfall or irrigation occurs within 4 hours after postemergence applications.
- Stress: Unsatisfactory control may result if BRASH<sup>®</sup> is applied to crops under stress such as stress due to lack of moisture, hail damage, flooding, herbicide injury, mechanical injury, or widely fluctuating temperatures.
- Do not apply to crops that exhibit injury (leaf phytotoxicity or plant stunting) produced by any other prior herbicide applications, because this injury may be enhanced or prolonged by applying BRASH<sup>®</sup>.
- Do not apply through any type of irrigation equipment. Do not contaminate irrigation ditches or water used for domestic purposes.
- This product cannot be used to formulate or reformulate any other pesticide product.

#### FOOD/FEED CROP-SPECIFIC INFORMATION

#### Pastures, Rangeland and Grass (Hay, Silage)

BRASH<sup>®</sup> is recommended for use for pasture (including pasture grown for hay), rangeland and grass grown for hay or silage.

Refer to the **ANNUAL WEEDS** and **BIENNIAL and PERENNIAL WEEDS** Application Rate and Timing tables for rate selection based on targeted weed or brush species. Some weed species will require tank mixes for adequate control. Rates above 4 pints of BRASH<sup>®</sup> per acre are for spot treatments only. Retreatments may be made as needed; however, do not exceed a total of 8 pints of BRASH<sup>®</sup> per treated acre during a growing season.

BRASH<sup>®</sup> uses described in this situation also pertain to small grains (such as barley, corn, forage sorghum, oats, rye, sudangrass or wheat) grown for pasture, hay, and silage only. Newly seeded areas, including small grains grown for pasture or hay, may be injured if rates of BRASH<sup>®</sup> greater than 2 pints per acre are applied.

In newly established hybrid Bermudagrass, Pangolagrass, and stargrasses (*Cynodon spp.*), use 1-2 quarts of BRASH<sup>®</sup> per acre to control or suppress weeds after planting vegetative propogules (stolens) of hybrid bermudagrasses. In addition to the weeds listed in the ANNUAL and BIENNIAL and PERENNIAL WEEDS tables, this rate of BRASH<sup>®</sup> will control or suppress annual sedges, broadleaf signalgrass, crabgrass, and goosegrass. Best results will be obtained if BRASH<sup>®</sup> is applied at the germinating stage of weeds. Under favorable conditions, this is usually 7-10 days after planting these grasses. Reduced control can be expected if weeds are allowed to reach 1" in height before application or if germination of weeds occurs 10 days after application.

Do not use on bentgrass, susceptible grass pastures (such as carpetgrass, buffalograss or St. Augustine grass), lespedeza, wild winter peas, vetch, clover and alfalfa pastures as injury will occur.

When perennial weeds are reaching maturity, mowing and allowing some regrowth will enhance control. Difficult to control weeds and brush may require repeat application.

For pasture renovations, wait 3 weeks per quart per acre of BRASH<sup>®</sup> used before interseeding or injury may occur.

/29

If grasses are grown for seed or for seed-down purposes, do not apply after grass reaches the joint stage.

#### Grazing and feeding restrictions - Non-lactating animals

Remove meat animals from treated areas 30 days prior to slaughter. There is no waiting period between treatment and grazing for non-lactating animals.

#### Grazing and feeding restrictions - Lactating animals

Do not graze lactating dairy animals within 7 days of treatment.

**Dry hay and silage -** Treated grasses may be harvested for dry hay or silage but do not harvest within 37 days of treatment.

**Pasture and Rangeland Tank Mixes:** BRASH<sup>®</sup> may be applied in tank mixes with one or more of the following herbicides: Ally<sup>®</sup>, Amber<sup>®</sup>, Albaugh Dicamba DMA Salt or Banvel<sup>®</sup>, Clarity<sup>®</sup>, Rave<sup>™</sup>.

#### Pasture and Rangeland Restrictions:

Do not cut forage for hay within 7 days of application.

#### Pasture and Rangeland Restrictions, Postemergence:

For susceptible annual and biennial broadleaf weeds: Use 1.0 lbs. 2,4-D ae (2.78 pints product)/acre per application.

For moderately susceptible biennial and perennial broadleaf weeds: Use 1.0 to 2.0 lbs 2,4-D ae (2.78 – 5.6 pints product)/acre per application.

For difficult to control weeds and woody plants: Use 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

Spot Treatment: Use 2.0 lbs. 2,4-D ae (5.6 pints product)/acre.

Maximum of two applications per year.

Maximum of 4.0 lbs. 2,4-D ae (11.2 pints product)/acre per year.

Minimum of 30 days between applications.

If grass is to be cut for hay, Agricultural Use Requirements for Worker Protection Standard are applicable.

#### SORGHUM

#### Rates and Timings

Apply 1 pint of BRASH<sup>®</sup> per acre to sorghum in the 3-5 leaf stage (4-8" tall). Apply BRASH<sup>®</sup> when weeds are small (less than 3" tall) for best performance.

Applications of BRASH<sup>®</sup> to sorghum during periods of rapid growth may result in temporary leaning of plants or rolling of leaves. These effects are usually outgrown within 10 to 14 days. Sorghum growing under conditions of stress such as high moisture, low fertility, and abnormal temperature may be more sensitive to applications of BRASH<sup>®</sup>.

Do not graze or feed treated sorghum forage or silage prior to mature grain stage. If sorghum is grown for pasture, hay or silage, refer to the **Pasture and Rangeland** section of the **Food/Feed Crop-Specific Information** section of this label for livestock grazing and feeding restrictions.

#### Sorghum Restrictions:

Do not apply BRASH<sup>®</sup> to sorghum grown for seed production.

The preharvest interval (PHI) is 30 days.

Do not permit meat or dairy animals to consume treated crop as fodder or forage for 30 days following application.

#### Sorghum Restrictions, Postemergence:

Do not use surfactants or oils with postemergence applications of BRASH® on sorghum crops

Do not use BRASH<sup>®</sup> if the potential for sorghum injury is not acceptable.

Limited to 1 application per crop cycle.

Maximum of 1.0 lb. of 2,4-D ae (2.78 pints product)/acre per application.

**SORGHUM Tank Mixes:** BRASH<sup>®</sup> may be applied in tank mixes with one or more of the following herbicides: Atrazine, Basagran<sup>®</sup>, BROX<sup>™</sup> 2EC Herbicide or Buctril<sup>®</sup>, Laddok<sup>®</sup> S-12, Paramount<sup>®</sup>, Peak<sup>®</sup>, or Permit<sup>®</sup>.

#### SUGARCANE

Applications of BRASH<sup>®</sup> can be made any time after the weeds have emerged and are actively growing but prior to the close-in stage of sugarcane. When possible, direct the spray beneath the sugarcane canopy in order to minimize the likelihood of crop injury. The use of directed sprays will also aid in maximizing spray coverage of weed foliage. Application rates and timing are given below. Use the higher level of listed rate ranges when treating dense vegetative growth.

• For control of listed ANNUAL broadleaf weeds, apply 2 pints of BRASH<sup>®</sup> per treated acre.

For suppression of listed PERENNIALS, apply 1 – 5.6 pints of BRASH<sup>®</sup> per treated acre.

#### Sugarcane Restrictions:

Do not harvest cane prior to crop maturity.

Do not apply more than 4 lbs. 2,4-D ae (11.2 pints product)/acre per crop cycle.

#### Sugarcane Restrictions, Preemergence:

Limited to one application per crop cycle.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

#### Sugarcane Restrictions, Postemergence:

Limited to one application per crop cycle.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

**SUGARCANE Tank Mixes:** BRASH<sup>®</sup> may be tank mixed with one or more of the following herbicides: Asulox<sup>®</sup>, Atrazine, Evik<sup>®</sup>, Sencor<sup>®</sup>, or Sinbar<sup>®</sup>.

#### WHEAT

#### (Fall and Spring-seeded)

If small grains are grown for pasture or hay only, refer to the **Pastures**, **Rangeland and Grass (Hay, Silage)** section of this label.

Do not graze or harvest for livestock feed prior to crop maturity. Do not use BRASH<sup>®</sup> in wheat underseeded to legumes.

#### EARLY SEASON APPLICATIONS:

Apply 0.5-1 pint of BRASH<sup>®</sup> per acre to wheat unless using one of the wheat specific programs below.

Early season applications to spring-seeded wheat must be made after tillering and before wheat reaches the 6-leaf stage.

Early season applications to fall-seeded wheat must be made after tillering and prior to the jointing stage. Care should be taken in staging early developing wheat varieties such as TAM 107, Madison, or Wakefield to be certain that the application occurs prior to the jointing stage.

#### SPECIFIC USE PROGRAMS FOR FALL-SEEDED WHEAT ONLY:

Up to 1.33 pints of BRASH<sup>®</sup> per acre may be applied on fall-seeded wheat after the wheat begins to tiller for suppression of perennial weeds, such as field bindweed. Applications may be made in the fall following a frost but before a killing freeze. Periods of extending stresses such as cold and wet weather may enhance the possibility of crop injury. For fall applications only, do not use if the potential for crop injury is not acceptable.

#### PREHARVEST APPLICATIONS:

BRASH<sup>®</sup> can be used to control weeds that may interfere with harvest of wheat. Apply up to 2 pints of BRASH<sup>®</sup> per acre as a broadcast or spot treatment to annual broadleaf weeds when wheat is in the hard dough stage and the green color is gone from the nodes (joints) of the stem. Best results will be obtained if application can be made when weeds are actively growing but before weeds canopy.

Do not use preharvest-treated wheat for seed unless a germination test is performed on the seed with an acceptable result of 95% germination or better.

For control of additional broadleaf weeds or grasses, BRASH<sup>®</sup> may be tank mixed with other herbicides such as Ally<sup>®</sup>, Gly Star™ Plus or Roundup<sup>®</sup> Ultra that are registered for preharvest use in wheat.

Preharvest use of BRASH<sup>®</sup> is not registered for use in California.

#### Wheat Restrictions:

Do not graze or harvest for livestock feed prior to crop maturity.

Do not use Brash<sup>®</sup> in wheat underseeded with legumes.

The preharvest interval (PHI) is 14 days.

Limited to 1.75 lbs. 2,4-D ae (4.9 pints product)/acre per crop cycle.

#### Wheat Restrictions, Postemergence:

Limited to one postemergence application per crop cycle.

Maximum of 1.25 lbs. 2,4-D ae (3.5 pints product) per application.

#### Wheat Restrictions, Preharvest:

Limited to one postemergence application per crop cycle.

Maximum of 0.5 lbs. 2,4-D ae (1.4 pints product) per application.

#### WHEAT Tank Mixes

For control of grasses or additional broadleaf weeds, BRASH<sup>®</sup> may be tank mixed with the herbicides listed in the table below. Read and follow the label of each tank mix product used for precautionary statements, directions for use, weeds controlled, geographic and other restrictions.

Tank Mix Partner	Rate per Acre			
Aim™	0.3 ounce			
Ally®	0.05-0.1 ounce <sup>1</sup>			
Amber®	0.14-0.28 ounce			
BROX <sup>™</sup> -M Herbicide or Bronate <sup>®</sup>	0.75-1.5 pints			
BROX <sup>™</sup> 2EC Herbicide or Buctril <sup>®</sup>	1-1.5 pints			
Canvas®	0.2-0.4 ounce			
Curtail™	2 - 2.67 pints			
Dakota®	16 fluid ounces			
Express <sup>®</sup>	0.083-0.167 ounce <sup>1</sup>			
Finesse	0.167-0.33 ounce <sup>1</sup>			
Glean®	0.167 ounce			
Harmony <sup>®</sup> Extra	0.167-0.33 ounce <sup>1</sup>			
Karmex <sup>® 3</sup>	0.5-1.5 pounds			
2,4-D amine	4-20 fluid ounces <sup>4</sup>			
Sencor <sup>®</sup> , (Metribuzin <sup>3</sup> )	0.25-0.375 pound a.i.			
Peak <sup>®1</sup>	0.25-0.38 ounce			
Stinger™ Tiller <sup>®2</sup>	4 – 5.33 fluid ounces			
Tiller <sup>® 2</sup>	1-1.7 pints			

<sup>1</sup>Do not use low rates of sulfonylurea herbicides such as Ally<sup>®</sup>, Amber<sup>®</sup>, Canvas<sup>®</sup>, Express<sup>®</sup>, Finesse<sup>®</sup>, Glean<sup>®</sup>, Harmony<sup>®</sup> Extra, and Peak<sup>®</sup> on more mature weeds or on dense vegetative growth. <sup>2</sup>Do not use BRASH<sup>®</sup> as a tank mix treatment with Dakota<sup>®</sup> or Tiller<sup>®</sup> in Durum wheat. Do not tank mix

Tiller<sup>®</sup> if wild oat is the target weed. <sup>3</sup>Tank mixes with Karmex<sup>®</sup> and metribuzin are for use in fall-seeded wheat only.

<sup>4</sup> BRASH<sup>®</sup> contains 0.36 pounds a.e. of 2,4-D per pint. When tank mixing with 2,4-D, do not exceed a combined total of 1.0 pound a.e. per acre of 2,4-D and do not exceed 0.5 pound a.e. of 2,4-D unless injury to wheat is acceptable.

#### BETWEEN CROP APPLICATIONS, CONSERVATION RESERVE PROGRAMS, GENERAL FARMSTEAD AND FALLOW SYSTEMS

These uses are considered Food/Feed Crops when harvested, grazed or foraged. Refer to the ADDITIVES section for information on adjuvant restrictions and the NON-FOOD/FEED USE (LAND NOT HARVESTED, GRAZED OR FORAGED) - SPECIFIC INFORMATION section for specific use directions.

#### **Restrictions:**

Plant only labeled crops within 29 days following application.

Limited to 2 applications per year.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

Minimum of 30 days between applications.

#### NON-FOOD/FEED USE (LAND NOT HARVESTED, GRAZED OR FORAGED) – SPECIFIC INFORMATION

#### **Between Crop Applications**

#### PREPLANT DIRECTIONS (POSTHARVEST, FALLOW, CROP STUBBLE, SET-ASIDE) FOR **BROADLEAF WEED CONTROL:**

BRASH<sup>®</sup> can be applied either postharvest in the fall, spring, or summer during the fallow period or to crop stubble/set-aside acres. Apply BRASH<sup>®</sup> as a broadcast or spot treatment to emerged and actively

growing weeds after crop harvest (postharvest) and before a killing frost or in the fallow cropland or crop stubble the following spring or summer.

Refer to the **Crop Rotational Restrictions** and **General Restrictions and Limitations** for the recommended interval between application and planting to prevent crop injury.

#### Rates and Timings:

Apply 0.5-5.6 pints of BRASH<sup>®</sup> per acre. Refer to the **ANNUAL WEEDS** and **BIENNIAL AND PERRENIAL WEEDS Application Rate and Timing** tables to determine the use rates for specific targeted weed species. Retreatments may be made as needed; however, do not exceed a total of 8 pints of BRASH<sup>®</sup> per treated acre during a growing season. For best performance, apply BRASH<sup>®</sup> when annual weeds are less than 6" tall, when biennial weeds are in the rosette stage and to perennial weed regrowth in late summer or fall following a mowing or tillage treatment. The most effective control of upright perennial broadleaf weeds such as Canada thistle and Jerusalem artichoke occurs if BRASH<sup>®</sup> is applied when the majority of weeds have at least 4-6" of regrowth or for weeds such as field bindweed and hedge bindweed that are in or beyond the full bloom stage.

Avoid disturbing treated areas following application. Treatments may not kill weeds that develop from seed or underground plant parts such as rhizomes or bulblets, after the effective period for BRASH<sup>®</sup>. For seedling control, a follow-up program or other cultural practices could be instituted.

Fallowland (crop stubble on idle land, or postharvest to crops, or between crops) Restrictions: Plant only labeled crops within 29 days following application.

Limited to 2 applications per year.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

Minimum of 30 days between application.

#### Between Crop Tank Mixes

Apply 0.5-2 pints of BRASH<sup>®</sup> per acre in tank mixes with one or more of the following herbicides for control of annual weeds, or 2-8 pints of BRASH<sup>®</sup> per acre for control of biennial and perennial weeds:

Aim™ Glyphosate Allv® Gramoxone<sup>®</sup> Extra Kerb™ Amber® Landmaster<sup>®</sup> BW Atrazine Paramount® Curtail™ Cyclone® Sencor® Distinct® Tordon™ 22K Touchdown<sup>®</sup> Failow Star™ Fallowmaster<sup>®</sup> 2,4-D Finesse®

#### CONSERVATION RESERVE PROGRAMS AND GENERAL FARMSTEAD

BRASH<sup>®</sup> is recommended for use for Conservation Reserve Programs, general farmstead (non-cropland only), weed and brush control, or use in State Recognized Noxious Weed areas (non-cropland areas).

Refer to the ANNUAL WEEDS and BIENNIAL AND PERRENIAL WEEDS Application Rate and Timing tables for rate selection based on targeted weed or brush species. Some weed species will require tank mixes for adequate control.

Rates above 4 pints of BRASH<sup>®</sup> per acre are for spot treatments only. Do not exceed a total of 8 pints of BRASH<sup>®</sup> per treated acre during a growing season.

#### Grasses in Conservation Reserve Program Areas

Annual Broadleaf Weeds – Apply when weeds are actively growing. Use higher rates on older weeds. Excessive injury may result if applied to young grasses with fewer than 6 leaves or prior to grasses being well established.

**Biennial and Perennial Broadleaf Weeds** – BRASH<sup>®</sup> may be used to suppress or control biennial and perennial broadleaf weeds in established grasses. Apply to actively growing weeds. Treat biennial weeds when they are in the seedling to rosette stage and before flower stalks become apparent. Treat perennial weeds in the bud to bloom stage.

#### Grasses in Conservation Reserve Program Areas Restrictions:

The preharvest interval (PHI) is 7 days (cut forage for hay).

#### Postemergence:

Limited to 2 applications per year.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

Minimum of 30 days between application.

If grass is to be cut for hay, Agricultural Use Requirements for the Worker Protection Standard are applicable.

For program lands, such as Conservation Reserve Program, consult program rules to determine whether grass or hay may be used. The more restrictive requirements of the program rules or this label must be followed.

# Farmstead and Fencerow Treatment

#### **Application Instructions**

BRASH<sup>®</sup> may be applied using water or oil and water emulsions in spot application to control undesirable vegetation using handgun or similar types of application equipment. In addition to weed species listed in the **ANNUAL WEEDS** and **BIENNIAL AND PERRENIAL WEEDS Application Rate and Timing** tables, these treatments may be used to control or suppress woody plant species listed below.

The following list of trees and vines can be controlled on farmsteads and fencerows as foliar, basal, or cut surface treatments:

Alder	Dogwood	Kudzu	Rose, McCartney	
Ash	Elm	Locust, Black	Rose, Multiflora	
Aspen	Grape	Maple	Sagebrush, Fringe	
Basswood	Greenbriar	Mesquite	Sassafras	
Beech	Hawthorn (Thornapple)	Oak	Spruce	
Blackberry	Hemlock	Oak, Poison	Sumac	
Blackgum	Hickory	Olive, Russian	Sweetgum	
Cedar	Honeylocust	Persimmon, Eastern	Sycamore	
Cherry	Honeysuckle	Pine	Tarbrush	
Chinquapin	Hornbeam	Plum, Sand (Wild Plum)	Willow	
Cottonwood	Huckleberry	Poplar	Witchhazel	
Creosotebush	Huisache	Rabbitbrush	Yaupon	
Dewberry	Ivy, Poison	Redcedar, Eastern	Yucca	

To prepare oil and water emulsions, mix in the order and proportions indicated below. The solution should remain milky colored without an oily layer on top when under agitation. If an oily layer forms, increase the amount of emulsifier or change to a more effective emulsifier.

Do not exceed 40 gallons of spray solution per treated acre per application. Forty gallons of spray solution contains 1.0 lb a.e. dicamba and 2.87 lb a.e. 2,4-D. Spray individual plants to wet. Do not allow this spray mixture to come into contact with desirable vegetation.

To control brush, briars, and weeds along fencerows surrounding pasture and ranch lands, and fallow fields, use a tank mix of 2.5% BRASH<sup>®</sup>, 87.5% water, 10% diesel fuel, and sufficient emulsifier (to mix the diesel and emulsifier). The diesel oil in this tank mix will damage or kill desirable grasses and should not be used in pastures or where damage to desirable species cannot be tolerated.

- 1. **Water:** Begin by agitating a thoroughly clean sprayer tank with the desired quantity of clean water. Maintain constant agitation during complete mixing procedure.
- 2. Emulsifier: Add 0.5% volume to volume
- 3. **BRASH<sup>®</sup>:** Add 2.5 gallons per 100 gallons of total intended solution.
- 4. Diesel Oil: Add 10 gallons per 100 gallons of total intended solution.

Maintain constant agitation during application. Under good agitation, the spray solution should be milky white with no oily layer on top. If an oily layer forms, increase the amount of emulsifier or change to a more effective emulsifier.

CRP, Farmstead and Fencerow Treatment Restrictions, Postemergence – annual and perennial weeds:

Limited to 2 applications per year.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/are per application.

Minimum of 30 days between application.

**CRP**, Farmstead and Fencerow Treatment Restrictions, Postemergence – woody plants: Limited to 1 application per vear.

Maximum of 4.0 lbs. 2,4-D ae (11.2 pints product)/acre per year.

Applications to non-cropland areas are not applicable to treatment of commercial timber or other plants being grown for sale or other commercial use, or for commercial seed production, of for research.

#### For Spraying Foliar Applications

- 1. Spray when leaves have reached full size but have not hardened due to drought or maturity.
- 2. Spray individual plants to wet with handgun.
- 3. For larger stems (up to 3" in diameter) and hard to control species, direct spray stream to base of stems to wet the stem at soil surface in addition to wetting the foliage.
- 4. Do not apply under drip line of desirable trees or adjacent to desirable vegetation.

#### For Dormant Basal Applications

- 1. Increase diesel content to 15% or 15 gallons/100 gallons of total mixture.
- 2. Spray in late winter and early spring before plants break dormancy.
- 3. Spray the bottom 24" of stem to wet on all sides.
- 4. For larger stems (up to 3" in diameter) and hard to kill species, direct spray solution to base of stems to wet the soil at the stem/soil junction in addition to wetting the stem.
- 5. Do not apply under drip line of desirable trees or adjacent to desirable vegetation.

#### **Cut Surface Treatments**

BRASH<sup>®</sup> may be applied as a cut surface treatment for control of unwanted trees and prevention of sprouts of cut trees. Use BRASH<sup>®</sup> in an undiluted state.

**FRILL OR GIRDLE TREATMENTS:** Make a continuous cut or a series of overlapping cuts using an axe to girdle tree trunk. Spray or paint cut surface with BRASH<sup>®</sup>.

**STUMP TREATMENTS:** Spray or paint freshly cut surface with BRASH<sup>®</sup>. The cambium layer (the layer adjacent to the bark) should be thoroughly wet. Treat stumps within 6 hours after cutting.

#### PREPLANT APPLICATION DIRECTIONS FOR BROADLEAF CONTROL IN CROPLAND ROTATED TO WHEAT (POST-HARVEST / FALLOW / STUBBLE / SET-ASIDE) IMPORTANT

Before using this product, read and carefully observe all applicable directions, restrictions, and precautionary statements in this booklet and on the container label.

#### WEEDS CONTROLLED

BRASH<sup>®</sup>, when applied at the recommended rates, will control the ANNUAL and BIENNIAL weeds and suppress the PERENNIAL weeds listed below.

	ANNUALS		
Buckwheat, Wild	Mustards	Salsify, Western	
Cockle, Cow	Nightshade, Black Smartweed, Pennsylvan		
Cocklebur, Common	Pigweed, Redroot (Carelessweed)	Sowthistle, Annual	
Knotweed	Pigweed, Rough	Sunflower	
Kochia	Purslane, Common Tansymustard		
Lambsquarters, Common	Ragweed, Common	Thistle, Russian	
Mallow, Common	Sage, Lanceleaf	Velvetleaf	
	BIENNIALS		
Carrot, Wild	Starthistle, Yellow	Thistle, Musk	
Ragwort, Tansy Thistle, Bull		Thistle, Plumeless	
	PERENNIALS	· · · · · · · · · · · · · · · · · · ·	
Bindweed, Field	Dock, Curly	Thistle, Canada	

#### RATES AND TIMINGS

Application may be made to fallow land, wheat stubble or land to be rotated to wheat. Application should be made to emerged and actively growing weeds. Use higher rate when treating dense vegetative growth. Avoid disturbing treated areas for seven days following application.

Wheat injury may occur if the interval between application and planting is less than 10 days for each pint per acre of BRASH<sup>®</sup> used. Exclude days when ground is frozen.

Weed Type & Stage	Broadcast rate per Treated Acre Amount
Annual	
Small, actively growing (less than 4 inches)	1.0 – 1.5 pints
Established weed growth	1.5 – 3.0 pints
(greater than 4 inches)	
Biennial	· · ·
Rosette diameter	
(3 inches or less)	1.5 – 2.0 pints
(3 inches or more)	2.0 – 4.0 pints
Greater than 4 inches, tillering bolted or flowering	4.0 pints

#### Perennial

Suppression or top growth control Seasonal Control

2.0 - 4.0 pints 4.0 - 8.0 pints

Add 0.5% v/v of an agriculturally approved surfactant to BRASH<sup>®</sup> when used alone or in a tank mix. The addition of a surfactant will enhance spray coverage and the herbicide's penetration of weed foliage.

Retreatments may be made as needed; however, do not exceed a total of 8 pints of BRASH<sup>®</sup> per treated acre.

Cropland Rotated to Wheat (Post-Harvest / Fallow / Stubble / Set-Aside) Restrictions: Plant only labeled crops within 29 days following application.

Limited to 2 applications per year.

Maximum of 2.0 lbs. 2,4-D ae (5.6 pints product)/acre per application.

Minimum of 30 days between applications.

#### TANK MIX TREATMENTS

BRASH<sup>®</sup> may be tank mixed with one or more of the following herbicides for control of grasses or additional broadleaf weeds. Read and follow the label of each tank mix product used for precautionary statements, directions for use, rates and timings, weeds controlled, geographic or other restrictions. Add 0.5% v/v of an agriculturally approved surfactant to all tank mixes.

Herbicide					Rate per Treated Acre (lb ai)		
Atrazine	Atrazine			1/2 to 3.0			
Chlorsulfuron	Chlorsulfuron (Glean <sup>®</sup> )			0.016 to 0.024			
Glyphosate Roundup <sup>®</sup> )	`(Gly	Star™	Original	or	1/4 to 2.0		
Metribuzin					1/3 to 3/4		
Paraquat					1/2 to 1.0		

#### WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

#### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR

DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR RISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

#### **REGISTERED TRADEMARKS**

BROX<sup>™</sup>, Fallow Star<sup>™</sup> and Gly Star<sup>™</sup> are trademarks of Albaugh, Inc.

Basagran<sup>®</sup> and Laddok<sup>®</sup> are registered trademarks of BASF Ag Products. Banvel<sup>®</sup>, Clarity<sup>®</sup>, Distinct<sup>®</sup>, Fallowmaster<sup>®</sup> and Paramount<sup>®</sup> are registered trademarks of BASF Corporation.

Asulox<sup>®</sup>, Bronate<sup>®</sup>, Buctril<sup>®</sup>, Dakota<sup>®</sup>, Sencor<sup>®</sup> and Tiller<sup>®</sup> are registered trademarks of Bayer CropScience.

Curtail™, Kerb™, Stinger™ and Tordon™ are trademarks of Dow AgroSciences, LLC.

Ally<sup>®</sup>, Canvas<sup>®</sup>, Express<sup>®</sup>, Finesse<sup>®</sup>, Glean<sup>®</sup>, Harmony<sup>®</sup> Extra, Karmex<sup>®</sup>, and Sinbar<sup>®</sup> are registered trademarks of E.I. DuPont de Nemours & Company.

Aim<sup>™</sup> is a trademark of FMC Corporation.

Landmaster<sup>®</sup>, Permit<sup>®</sup> and Roundup<sup>®</sup> are registered trademarks of the Monsanto Company. Amber<sup>®</sup>, Cyclone<sup>®</sup>, Evik<sup>®</sup>, Gramoxone<sup>®</sup>, Peak<sup>®</sup>, Rave<sup>®</sup> and Touchdown<sup>®</sup> are registered trademarks of Syngenta Crop Protection, Inc.

Brash<sup>®</sup> and Sterling<sup>®</sup> are registered trademarks of Winfield Solutions, LLC. AgriSolutions™ is a trademark of Winfield Solutions. LLC.

	· · · · · ·				<b>25</b> / 29
	United States A Environmental Protection Agency Washington, DC 20460			OPP I	dentifier Number
· · · · · · · · · · · · · · · · · · ·		Application for Pe	Sticide - Section I		
1. Company / Product Name <b>400-516</b>		2. EPA Product N	Manager T. Kish	1	None [] Restricted
4. Company / Product (Name) PACZOL	TECHNICAL	PM#	22		
5. Name and Address of Applicant (Incl Cherntura Corporati 199 Benson Road Middlebury, Connec ] check if this is a new a	on ticut 06749-0001	similar or iden EPA	Review. In accordance trical in composition and A Reg No.		Section 3(c)(3)(b)(I), my product is
		Sectio	on II	•	
[D] Amendment - Explain	below.		[[]]		ed labels in response to ter dated
[[]] Resubmission in respo	onse to Agency letter date	d	[[]]	"Me Too"	Application.
[X] Notification - Explain	below.		[[]]	Other - Exp	plain below.
§§ 156.10, 156.140, Confidential Statement any false statement to	156.144, 156.146, a of Formula of this pro EPA. I further under 40, 156.144, 156.146,	nd 156.156. No oduct. I understand stand that if the a , and 156.156, this	o other changes have d that it is a violation mended label is not s product may be in v of FIFRA."	ve been ma of 18 U.S.C. consistent v	PA's regulations at 40 CFR ide to the labeling or the Sec. 1001 to willfully make vith the requirements of 40 IFRA, and I may be subject
1. Material This Product Will Be	Packaged In:				
·	Unit Packaging [[]] Yes [X] No		Water Soluble Packaging [[]] Yes [[2]] No		2. Type of Container [□] Metal [☑] Plastic [□] Glass [□] Paper [☑] Other (Specify) fiber drum with plastic liner
	Unit Packaging wgt	lo. Per container	If "Yes" Packaging wgt	No. Per contain	ıer
3. Location of Net Contents Information [X] Label [] Containe		. Size(s) Retail Container 5 Ib, 25 Ib		[X] On Lab	
6. Manner in Which Label is Affixed to	Product .		[🛛] Lithograph [🔄] Paper glued [🔲] Stenciled	Other	
_ = // · · · · · · · · · · · · · · · · ·		Section	ı - IV	•	
1. Contact Point (Complete items directly	below for identification of indivi	idual to be contacted, if nec	essary, to process this applicatio	m.)	
Name Allen Ble	m		n Specialist		ne No. (Include Aréa Code) (203) 573-2487 nail: allen.blem@chemtura.com
I certify that the statements I have that any knowingly false or mis 2. Signature	e made on this form and all atta	nishable by fine or imprise 3. Title	onment or both under applicat	ble law.	6. Date Application Received (Stamped)
4. Typed Name	I'm hor	5. Date	ration Manager, North	America	
Michael Dupre June 6, 20					

# Alice Walker, Ph.D.

REGULATORY CONSULTING • 3094 COUNTRY CLUB ROAD • SENATOBIA, MS 38668

June 13, 2008

ć,

Document Processing Desk (Notif) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, DC 20460

### Re: Notification of Revised Container Disposal Language Brash, EPA Reg. No. 1381-202

This correspondence will constitute notification from Winfield Solutions, LLC that we have reinserted the statement "Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill..." which was inadvertently removed from the Storage and Disposal section in our label stamped June 4, 2008.

I believe this notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Thank you for adding this notification to the registration record for this product.

Sincerely,

1) ceku

Alice Walker, Ph.D. Regulatory Consultant

Enclosures cc: Gary Halvorson



Chemtura Corporation 199 Benson Road Middlebury, Connecticut 06749

203-573-2000 **tel** www.chemtura.com

June 6, 2008

Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 2777 S. Crystal Drive Room S-4900, One Potomac Yard, 4<sup>th</sup> Floor Arlington, Virginia 22202-4501

Attention:

# Ms. Linda Arrington, Notifications Registration Division (7504P)

Subject:

Amendment by the Notification Method, per PRN 2007-4: PACZOL<sup>®</sup> Technical (EPA Reg. No. 400-516)

Dear Ms. Arrington:

Chemtura Corporation (Company No. 400) herein submits an Application for Amendment of Registration by the Notification Method for PACZOL<sup>®</sup> Technical (EPA Reg. No. 400-516), an end-use product containing the active ingredient paclobutrazol (PC Code 125601). This is a solid (crystalline solid) product stored and transported in nonrefillable non-rigid containers (fiber drums with liners). This Notification is submitted in response to PR Notice 2007-4 (as amended April 23, 2008), and revises the Container Disposal statements with the exact wording set forth in the regulations.

We request that you send us a copy of the "Notification-Stamped" label, for those states that require such stamped label for their files.

If you have any questions about this notification, please contact either me or Allen Blem (Registration Specialist) at (203) 573-2487 or email <u>allen.blem@chemtura.com</u>.

Sincerely,

Chemtura Corporation

Michael Dupre " Product Registration Mgr., N.A."

Attachments:

Form 8570-1, with certification statement PACZOL Technical label version 002, 1 copy, marked up

# **PACZOL® TECHNICAL** FOR FORMULATION USE ONLY INTO AN END-USE PLANT GROWTH REGULATOR

129



# KEEP OUT OF REACH OF CHILDREN WARNING

# **FIRST AID**

IF ON SKIN OR CLOTHING	<ul> <li>Take off contaminated clothing.</li> <li>Rinse skin immediately with plenty of wa</li> <li>Call a poison control center or doctor for</li> </ul>	
IF SWALLOWED	<ul> <li>Call a poison control center or doctor imit</li> <li>Have person sip a glass of water if able to</li> <li>Do not induce vomiting unless told to do</li> <li>Do not give anything by mouth to an undersity of the second s</li></ul>	o swallow. o so by a poison control center or doctor.
IF IN EYES	<ul> <li>Hold eye open and rinse slowly and gent</li> <li>Remove contact lenses, if present, after t</li> <li>Call a poison control center or doctor for</li> </ul>	he first 5 minutes, then continue rinsing eye.
IF INHALED	<ul> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an a to-mouth if possible.</li> <li>Call a poison control center or doctor for</li> </ul>	ambulance, then give artificial respiration, preferably mouth- further treatment advice.
EMERGENCY ASS treatment.	<b>ISTANCE:</b> Have the product container or label	with you when calling a poison control center or doctor, or going fo
	EMERGENCY PHONE	800-292-5898
i .	SAFETY DATA/INFORMATION	866-430-2775

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

800-424-9300

....

May be fatal if absorbed through skin. Harmful if swallowed. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Wear long-sleeved shirt and long pants, socks, chemical-resistant footwear, and chemical-resistant gloves. Remove and wash contaminated clothing before reuse. Wear protective eyewear.

#### **ENVIRONMENTAL HAZARDS**

Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans or other waters unless in faccordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting autionity has been notified in writing prior to discharge. (Pesticide Regulation Notice 93-10). Do not discharge effluent containing this product to server systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the Environmental Protection Agency.

#### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

#### STORAGE AND DISPOSAL

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

TRANSPORTATION EMERGENCY (CHEMTREC)

PESTICIDE STORAGE: Keep container closed when not in use. In case of spill or leak on floor or paved surfaces, sweep up and remove to chemical waste area.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility. **CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Triple rinse (or equivalent) and offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

#### **BORECTIONS FOR USE**

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

For formulation into a plant growth regulator for greenhouse (non-food only), non-food use on container grown nursery stock and ornamentals and for terrestrial, non-food use on container grown nursery stock. This product may be used to formulate products for any additional uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements. Formulators using this product are responsible for obtaining EPA registration for their formulated product(s).

FORMULATION ASSISTANCE: Additional information regarding specific problems in formulation, involving this product, may be obtained by writing or calling Chemtura Corporation, Middlebury, CT 06749, Telephone: 203-573-2000.

**IMPORTANT NOTICE** - Seller warrants that this product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with the directions and instructions specified on the label under normal conditions of use, but 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, or under abnormal conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.

**NET CONTENTS:** 

Manufactured for: Chemtura Corporation 199 Benson Road Middlebury, Connecticut 06749 USA EPA Registration No. 400-516 EPA Establishment No.

Paczol® is Registered Trademark of Chemtura Corporation © Copyright 2008, Chemtutra Corporation

002

666 66

оось 1/2 60

o ococ ococ ococ

400.00

/29