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

NOV 1 5 7002

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

Dear Mr. Martens:

Subject:

Conversion from 2,4-DP to 2,4-DP-p

EH1073 Trimec Ester

EPA Registration Number: 2217-775

Your Submission Dated November 15, 2001

The Agency is conditionally approving an amendment to the registration for the above-referenced product under the authority of section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Under this amendment the Agency is approving the conversion of the active ingredient 2,4-DP from its racemic form [2-(2,4-dichlorophenoxy) propionic acid, or applicable salt or ester thereof] to its single isomer form [(+)-R-2-(2,4-dichlorophenoxy) propionic acid, or applicable salt or ester thereof]. The revised labeling and Confidential Statements of Formula (CSFs) submitted in support of the conversion are acceptable with the following provisions:

- This acceptance is based on our understanding that no changes have been made to product other than those specified within the body of your certification statement and cover letter dated August 15, 2001. No other revisions are being reviewed or considered with this action.
- 2. You may sell or distribute product containing the racemic form of 2,4-DP and bearing the previously approved labeling for 18 months from the date of this letter.

A copy of the revised CSFs (Basic Formation and Alternate Formulations Numbered 1 through 4 dated November 12, 2001) have been placed in the Agency's file for the subject product. These CSFs supersedes all previously submitted CSFs for this product. Please note for future submissions our records indicate that the source product EPA Registration No. 7969-132 contains 89% active ingredient.

A stamped copy of the labeling is enclosed for your records. Submit one (1) copy of your final printed labeling before you release the product for shipment

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

Joanne I. Miller

Product Manager (23)

Herbicide Branch

Registration Division (7505C)

Enclosure

Official Name: EH 1073 TRIMEC® ESTER

Brand Name: GORDON'S CLEANOUT BRUSH AND STUMP CONTROL

ACCEPTED with COMMENTS In EPA Letter Dated:

NOV 1 5 2002

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

ACTIVE INGREDIENTS: registered under EPA Reg. No.	175
Isooctyl (2-ethylhexyl) ester of 2,4-dichlorophenoxyacetic acid	9.74%
2-ethylhexyl ester of (+)-R-2-(2,4-dichlorophenoxy) propionic acid	4.78%
Dicamba: 3,6-dichloro-o-anisic acid	1.65%
INERT INGREDIENTS:	<u>83.83%</u>

TOTAL 100.00%

This product contains:

0.49 lbs. 2,4-dichlorophenoxyacetic acid equivalent per gallon or 6.46%

0.24 lbs. 2-ethylhexyl ester of (+)-R-2-(2,4-dichlorophenoxy) propionic acid equivalent per gallon or 3.23%

0.12 lbs. 3,6-dichloro-o-anisic acid equivalent per gallon or 1.65%

Contains the single isomer form of 2,4-DP-p. Contains aromatic petroleum distillates. Isomer Specific by AOAC Method

WARNING

See next panel for Statement of Practical Treatment and additional Precautionary Statements.

NET CONTENTS (1, 2.5, 5, 30, 55) U.S. GALLON

AP
EPA REG. NO. 2217-775 Amend
EPA Est. No. 2217-KS-1
MANUFACTURED BY:

Lid Gondon
An Employee-Owned Company
1217 West 12th Street
Kanase City, Milesoun 84101



READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Causes substantial but temporary eye injury. Causes skin irritation. Harmful if swallowed or absorbed through the skin. Do not get in eyes, on skin or on clothing.

FOR INDUSTRIAL SITES ONLY -

Clothing Requirement Statements: When mixing, loading, or applying this product, or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

Personal Hygiene Statements: Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

FOR TURF SITES ONLY -

Clothing Requirement Statements: When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front brow and temple protection.

Personal Hygiene Statements: After using this product, rinse gloves before removing; remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

ENGINEERING CONTROL STATEMENTS -

Containers over 1 gallon and less than 5 gallons: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron.

Containers of 5 gallons or more: Do not open-pour product from this container. A mechanical system (such as probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

Statement of Practical Treatment

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

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

IF SWALLOWED: Drink promptly a large quantity of milk, eggwhites, gelatin solution or if these are not available, large quantities of water. Avoid alcohol. Do not induce vomiting. Get medical attention

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater. When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area. Do not contaminate domestic or irrigation waters.

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

If spills occur, collect the material and dispose of by following disposal instructions on this label.

PHYSICAL OR CHEMICAL HAZARD: Do not use or store near heat or open flame.

OPTION(1).

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

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

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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:** <u>For Plastic Containers</u> - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke. <u>For Metal Containers</u> - 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.

APPLICATION TIMING FOR MIXED BRUSH:

Spraying can be effective throughout the growing season from full leaf to leaf drop for mixed brush. Full coverage sprays should be applied during warm weather when brush and broadleaf weeds are young and actively growing. All leaves, stems, and shoots should be thoroughly wetted to the ground. Do not cut brush until the herbicide has translocated throughout the plant causing root death. Basal bark, cut stump, and frill treatments of EH1073 Trimec[®] Ester are appropriate during the dormant period before bud growth or any signs of active growth of the mixed brush. However, basal bark treatments may be applied anytime of the year except when water or snow prevents spraying to the ground line.

Brush Controlled:				
Ash	Buckbrush	Honey locust	Spruce	
Aspen	Cedar	Honeysuckle	Sumac	
Birch	Cherry	Kudzu	Sycamore	
Blackberry	Cottonwood	Multiflora rose	Wild plum	
Black cherry	Dogwood	Oak	Willow	
Black locust	Elm	Pine		
Brambles	Gooseberry	Shortleaf pine		

Weeds Controlled	l:		
Bedstraw	Healall	Peppergrass	Sunflower
Bindweed	Henbit	Pigweed	Thistles
Black medic	Jimsonweed	Plantain	Trumpetcreeper
Buckhorn	Knotweed	Poison ivy	Velvetleaf
Burdock	Kochia	Poison oak	Wild carrot
Chicory	Lambsquarters	Purslane	Wild garlic
Chickweed	Lespedeza	Ragweed	Wild lettuce
Clover	Mallow	Sheep sorrel	Wild onion
Cocklebur	Morningglory	Shepherdspurse	Yarrow
Dandelion	Mustard	Smartweed	
Dock	Nettle	Speedwell	
Ground ivy	Oxalis	Spurge	

SPRAY PREPARATION:

Oil Spray - Add one-half the required amount of diesel oil (No. 1 or No. 2 fuel oil) to the spray tank, then add EH1073 Trimec[®] Ester with agitation and complete filling the tank with diesel oil. Mix thoroughly and provide adequate agitation during mixing and spraying.

Water Spray - Add one-half of the required amount of water to the spray tank, then add slowly EH1073 Trimec[®] Ester with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Tank Mixing With Garlon® 4 Herbicide - EH1073 Trimec® Ester and Garlon® 4 Herbicide can be tank mixed in oil or water carriers for use in roadsides, rights-of-ways, railroads, fencerows, industrial sites and other similar noncrop areas. Add one-third of the required amount of diesel oil or water to the spray tank. Add the EH1073 Trimec® Ester slowly with agitation, then add another one-third of the carrier to the tank. Next add slowly the Garlon® 4 Herbicide and the balance of the carrier. Do not mix the chemicals simultaneously. Continue the agitation during each step. All label limitations, dosage rates, and precautions of both products must be followed. A mixture of EH1073 Trimec® Ester and Garlon® 4 Herbicide should be used in accordance with the more restrictive of label limitations and precautions. No label dosage rates should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Aerial applications of this tank mix can be made with helicopter only.

EH1073 Trimec® Ester is recommended to control perennial broadleaf weeds and undesirable woody plants established in noncropland. It is effective for buckbrush, poison ivy, multiflora rose, and sumac established in the uncultivated areas presented below:

UNCULTIVATED AGRICULTURAL AREAS AND UNCULTIVATED NONAGRICULTURAL AREAS:

A. Recommended Noncropland Sites.

- Barrier strips
- Farmvards
- · Fencerows or fence lines
- Firebreaks
- Highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadsides, roadside ditches, road shoulders, road embankments, dividers, and medians.
- Industrial sites: Lumberyards, tank farms, fuel or equipment storage areas.
- · Municipal, state, and federal lands: Airports and military installations
- Railroad rights-of-way
- Recreation areas: Fairgrounds, golf courses, parks, and areas adjacent to athletic fields.
- Utility rights-of-way: Telephone, pipeline, electrical powerlines, and communication transmission lines

B. Prohibitions for Noncropland Sites.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- Do not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.

MIXED BRUSH APPLICATIONS:

Use 2.0 to 4.0 gallons of EH1073 Trimec® Ester in 100 gallons of water and apply as a full coverage spray wetting all leaves, stems, and root collars of broadleaf weeds and woody plants. This spray concentration requires a spray volume of 100 to 300 gallons per acre, depending on the height and density of the plants. Use the higher dosage rates and spray volumes with hard to control species with dense canopies or under drought conditions.

TABLE 1. USE RATES FOR MIXED BRUSH WITH GROUND EQUIPMENT.

	Gallons of Product per 100 Gallons of Water®	Gallons of Product per Acre
Product Name	High Volume: 100 to 300 gal/A Total Spray Volume	Low Volume Broadcast: 20 to 100 gal/A Total Spray Volume
EH1073 Trimec® Ester	2.0 to 4.0	2.0 to 8.0

a)Diesel Oil, No. 1 or No. 2 fuel oil, mineral oil, or kerosene may be added to the water as an adjuvant at spray concentrations less than 1 to 2% volume/volume.

MIXED BRUSH APPLICATIONS WITH AERIAL EQUIPMENT:

Use 2.0 to 8.0 gallons of EH1073 Trimec[®] Ester in 8 to 25 gallons of water with aerial applications for mixed brush in noncropland areas. For best control, the brush and broadleaf weeds should be young and actively growing at the time of spraying. Use the higher rates and spray volumes when plants are dense or under drought conditions. Apply with aircraft equipped to minimize spray drift and apply only when there is little or no wind.

TABLE 2. USE RATES WITH AERIAL EQUIPMENT.

Product Name	Gallons of Product per Acre	Total Spray Volume
EH1073 Trimec® Ester	2.0 to 8.0	8 to 25 gal/A

BASAL APPLICATIONS:

Basal Bark Method - Mix the appropriate amount of EH1073 Trimec[®] Ester with the appropriate amounts of diesel oil, mineral oil, surfactants, and/or basal oils. *Refer to Table 3*. For high volume applications, apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed. For low volume applications, use an applicator calibrated to deliver a uniform spray to all sides of the stems and trunks up to a height of 18 to 24 inches. For all basal treatments thorough coverage is required.

TABLE 3. USE RATES FOR BASAL BARK METHOD IN NONCROPLAND SITES.

	Gallons Needed for Desired Volume			
Volume of Spray Solution, Gallons	EH1073 Trimec® Ester	Penetrants ^{a)}	Diesel Oil®	Basal Oilc)
Low Volume 10	8	0.25 to 0.50	1.5 to 1.75	
Low Volume 10	6.7	0.25 to 0.50		1.5 to 1.75
High Volume 100	12.0 to 20.0		80 to 88	

Penetrants such as Cide-Kick or Cide Kick II may improve control. Penetrant concentrations range from 2.5 to 5.0% of the spray volume and the 5.0% concentration may be more suitable in cold weather. Crop oil concentrates with pariffinic oil concentrations greater than 80% may also be used.

[»]Mineral oil or kerosene can be substituted for diesel oil.

NAndroc Oil, Hygrade I, Arborchem Basal Oil, JLB Oil Plus, or other proprietary basal oils may be used.

Cut Surface--Stump Treatment - This method is most effective and economical on stumps with diameters larger than 3 to 4 inches. This treatment can be applied throughout the year except when snow, ice or water prevents thorough spray coverage. Mix 2.0 to 4.0 gallons of EH1073 Trimec® Ester with 23 to 24 gallons of diesel oil. For backpack sprayers or other equipment mix 40 to 80 fluid ounces of EH1073 Trimec® Ester with 4.0 gallons of diesel oil. Apply to freshly cut tree stumps with a low volume backpack sprayer using an appropriate nozzle. Spray thoroughly the cut surfaces, bark, and exposed roots. Drench until runoff to the soil surface is noticed.

Frill Treatment - This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark but do not remove chips.

Mix 12 to 16 gallons of EH1073 Trimec® Ester in 100 gallons of diesel oil and treat freshly cut frills at any time of the year. Spray or pour the spray mixture into the frills without runoff.

USE PRECAUTIONS:

- Do not apply this product through any type of irrigation system.
- Do not allow this product to drift onto nontarget areas. Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers, or garden crops and all other hormone herbicide-sensitive desirable plants. Do not apply near sensitive plants since small quantities of herbicide drift may cause severe injury. Do not apply herbicide when wind speed is sufficient to cause drift.
- Do not apply herbicide when an air temperature inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect.
- Do not apply when temperatures exceed 85°F and humidity is high.
- ◆ To aid in avoiding spray drift use coarse sprays and low pressure. The use of thickening agents or antidrift additives and drift reducing equipment is of value in preventing spray drift.

ORNAMENTAL LAWNS & TURF (Cool Season Grasses Other Than Bentgrass):

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Re-entry Statement: Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled.

The best results will be obtained from spring or early fall applications when weeds have emerged and are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

USE PRECAUTIONS:

- Do not allow this product to drift onto nontarget areas. Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants.
- ◆ Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present.
- Use only lawn-type sprayers. Avoid fine sprays; coarse sprays are less likely to wind drift.
- Do not spray roots of ornamentals and trees. Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other ornamental species.
- Do not apply to newly seeded grasses until well established. Seed can be sown 3 to 4 weeks after application.
- Do not spray when air temperatures exceed 85°F.
- Do not apply this product through any type of irrigation system.

Application Rates - Apply 8 to 12 pints of product in 20 to 260 gallons of water per acre (3.0 to 4.4 fluid ounces in 1 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

The maximum application rate to turf is 0.8 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

Controlled Droplet Applicators (CDA) - Controlled droplet applicators allow ultra low spray volumes, and EH1073 Trimec® Ester may be applied at the rate of 8 pints of product per acre (3.0 fluid ounces of product per 1,000 square feet). Avoid overlapping between spray patterns. For the Herbi ULV sprayer, add 1.5 pints of EH1073 Trimec® Ester to 3.5 pints of water and apply this mixture to 8,250 square feet of lawn.

Small Area Applications (Not Recommended For Hose End Sprayers) - For spot treatments and small areas, mix EH1073 Trimec® Ester at 3.0 fluid ounces per 1.0 gallon of water per 1,000 square feet or follow the recommendations for hand operated sprayers presented below. Spray emerged weeds that are actively growing at any time of the season. On newly established lawns, apply EH1073 Trimec® Ester after the grass has been mowed at least 3 times. Do not water the lawn within 24 hours after application and observe use precautions.

Use Rates In Ornamental Lawns And Turf With Hand Operated Sprayers

Amount	of Product	Amount of Water	Area to be Treated
6 Tablespoons	3.0 fluid ounces	1 Gallon	1,000 Square Feet
12 Tablespoons	6.0 fluid ounces	2 Gailons	2,000 Square Feet
18 Tablespoons	9.0 fluid ounces	3 Gallons	3,000 Square Feet



OPTION (2). Text for Gordon's Cleanout TM Brush and Stump Control.

DIRECTIONS FOR USE

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

STORAGE & DISPOSAL

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

STORAGE: Keep from freezing. Store in original container in a locked storage area inaccessible to children and pets.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. 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: <u>For Plastic Containers</u> - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities by burning. If burned stay out of smoke. <u>For Metal Containers</u> - 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.

NONCROPLAND SITES:

Gordon's Cleanout™ Brush and Stump Control is recommended to control perennial broadleaf weeds and undesirable woody plants established in noncropland. It is effective for buckbrush, poison ivy, multiflora rose, and sumac established in the uncultivated areas presented below:

UNCULTIVATED AGRICULTURAL AREAS AND UNCULTIVATED NONAGRICULTURAL AREAS:

A. Recommended Noncropland Sites.

- Barrier strips
- Farmyards
- · Fencerows or fence lines
- Firebreaks
- Highway rights-of-way (principal, interstate, county, private, and unpaved roads): Roadside's, roadside ditches, road shoulders, road embankments, dividers, and medians.
- Industrial sites: Lumberyards, tank farms, fuel or equipment storage areas.
- Municipal, state, and federal lands: Airports and military installations
- Railroad rights-of-way
- Recreation areas: Fairgrounds, golf courses, parks, and areas adjacent to athletic fields.
- Utility rights-of-way: Telephone, pipeline, electrical powerlines, and communication transmission lines

B. Prohibitions for Noncropland Sites.

- Do not apply to any body of water such as lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays). Do not apply to any shorelines (noncropland sites adjacent to the edges of a body of water) for lakes, streams, rivers, ponds, reservoirs, or estuaries (salt water bays).
- aDo not apply to wetlands (swamps, bogs, potholes, or marshes).
- Do not apply to agricultural irrigation water or on agricultural irrigation ditchbanks and canals.
- Do not apply to agricultural drainage water or on agricultural ditchbanks.

APPLICATION TIMING FOR MIXED BRUSH:

Spraying can be effective throughout the growing season from full leaf to leaf drop for mixed brush. Full cover sprays should be applied during warm weather when brush and broadleaf weeds are young and actively growing. All leaves, stems, and shoots should be thoroughly wetted to the ground. Do not cut brush until the herbicide has translocated throughout the plant causing root death.

Basal bark, cut stump, and frill treatments of Gordon's Cleanout™ Brush and Stump Control are appropriate during the dormant period before bud growth or any signs of active growth of the mixed brush. However, basal bark treatments may be applied anytime of the year except when water or snow prevents spraying to the ground line.

BRUSH CONTROLLED		· · · · · · · · · · · · · · · · · · ·
Ash	Cherry	Oak
Aspen	Cottonwood	Pine
Birch	Dogwood	Shortleaf pine
Blackberry	Elm	Spruce
Black cherry	Gooseberry	Sumac
Black locust	Honey locust	Sycamore
Brambles	Honeysuckle	Wild plum
Buckbrush	Kudzu	Willow
Cedar	Multiflora rose	
WEEDS CONTROLLED		
Bedstraw	Knotweed	Ragweed
Bindweed	Kochia	Sheep sorrel
Black medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Smartweed
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistles
Cocklebur	Oxalis	Trumpetcreeper
Dandelion	Peppergrass	Velvetleaf
Dock	Pigweed	Wild carrot
Ground ivy	Plantain	Wild garlic
Healall	Poison ivy	Wild lettuce
Henbit	Poison oak	Wild onion
Jimsonweed	Purslane	Yarrow

BROADCAST FOLIAR APPLICATIONS:

Mixed Brush Applications With Ground Equipment:

For high volume foliar application - Use 2.0 to 4.0 gallons of Gordon's Cleanout™ Brush and Stump Control in 100 gallons of water (2.0 to 4.0% volume/volume) and apply as a full cover spray wetting all leaves, stems, and root collars of woody plants. This spray concentration requires a spray volume of 100 to 300 gallons per acre, depending on the height and density of the plants.

Spray Preparation - Add one-half of the required amount of water to the spray tank, then add slowly Gordon's Cleanout™ Brush and Stump Control with agitation, and complete filling the tank with water. To prevent separation of the emulsion, mix thoroughly and continue agitation while spraying.

Refer to Table 1 for additional spray preparation instructions with water.

Table 1. Quick-mix instructions for preparing 1.0 to 100 gallons of spray solution at 2.0 to 4.0% concentrations with water for foliar applications.

Spray Solution,	Amounts of Cleanout™ Brush and Stump Control requ		
Gallons	2%	3%	4%
1	2½ fluid ounces	3¾ fluid ounces	5 fluid ounces
3	8 fluid ounces	12 fluid ounces	16 fluid ounces
5	13 fluid ounces	20 fluid ounces	26 fluid ounces
25	½ gallon	34 gallon	1.0 gallon
50	1.0 gallon	1½ gallons	2.0 gallons
100	2.0 gallons	3.0 gallons	4.0 gallons

BASAL, CUT SURFACE, AND FRILL APPLICATIONS:

Spray Preparation with Oil - Add one-half the required amount of diesel oil (No. 1 or No. 2 fuel oil) to the spray tank, then add Gordon's Cleanout™ Brush and Stump Control with agitation and complete filling the tank with diesel oil. Mix thoroughly and provide adequate agitation during mixing and spraying. Substitutes for diesel oil include mineral oil, kerosene, and oil blends formulated for basal bark applications. Penetrants appropriate for oil soluble herbicides may improve control.

Basal Bark Method - Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed. Thorough coverage is required for all basal treatments.

Spray volumes will depend upon the sizes, types and densities of brush present. Apply a coarse spray as a drench treatment to the base of stems and trunks up to a height of 18 to 24 inches. Total coverage of the stems and root collars is essential. Spray until runoff and pooling at the ground line is noticed.

For Backpack Sprayers, Knapsack Sprayers, And Hand Pump Sprayers - Mix 20.0 fluid ounces of Gordon's Cleanout™ Brush and Stump Control with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or oil blends formulated for basal bark applications). Or, use the equivalent spray (concentration of 16.0% volume/volume.

Refer to Table 2 for additional spray preparation instructions with oil.

Table 2. Quick mix instructions for preparing 1 to 5 gallons of spray solutions with oil for basal bark, cut surface, and frill applications.

Spray Solution, Gallons	Amounts of Gordon's Cleanout™ Brush & Stump Control required, Fluid Ounces	
1	20 fluid ounces (11/4 pints)	
2	40 fluid ounces (2½ pints)	
3	60 fluid ounces (3¾ pints)	
5	100 fluid ounces (6¼ pints)	
Equal Mea	asures: 16 fluid ounces = 1 pint = ½ quart = 2 cups	

Cut Surface--Stump Treatment - This method is most effective and economical on stumps with diameters larger than 3 to 4 inches. This treatment can be applied throughout the year except when snow, ice, or water prevents thorough spray coverage.

For Backpack Sprayers, Knapsack Sprayers, and Hand Pump Sprayers - Mix 20.0 fluid ounces of Gordon's Cleanout™ Brush and Stump Control with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). Refer to Table 2 for spray preparation. Spray thoroughly the cut surfaces, bark, and exposed roots. Treat entire circumference of the tree. Drench until runoff to the soil surface is noticed.

Frill Treatment - This treatment is recommended for culling trees with trunk diameters greater than 5 to 6 inches. Make a frill by using an axe to cut overlapping notches in a continuous ring around the trunk near its base. Cut through the bark but do not remove chips.

Mix 20.0 fluid ounces of Gordon's Cleanout™ Brush and Stump Control with 1.0 gallon of oil (diesel oil, No. 1 or No. 2 fuel oil, kerosene, mineral oil, or other oil blends formulated for basal applications). Refer to Table 2 for spray preparation. Spray or pour the spray mixture into the frills without runoff.

USE PRECAUTIONS FOR ALL METHODS OF APPLICATION:

- Do not apply this product through any type of irrigation system.
- Do not allow this product to drift onto nontarget areas.
- Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers, or garden crops and all other hormone herbicide-sensitive desirable plants.
- Do not apply near sensitive plants since small quantities of herbicide drift may cause severe injury. Do
 not apply herbicide when wind speed is sufficient to cause drift.
- Do not apply herbicide when an air temperature inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect.
- Do not apply when temperatures exceed 85°F and humidity is high. To aid in avoiding spray drift use coarse sprays and low pressure. The use of thickening agents or anti drift additives and drift reducing equipment is of value in preventing spray drift.

ORNAMENTAL LAWNS AND TURF (Cool Season Grasses Other Than Bentgrass):

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Re-entry Statement: Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled.

The best results will be obtained from spring or early fall applications when weeds have emerged and are actively growing. Avoid spraying during long, excessively dry or hot periods unless adequate irrigation is available. Do not irrigate within 24 hours after application.

USE PRECAUTIONS:

- Do not allow this product to drift onto nontarget areas.
- Avoid drift of spray mist to vegetables, flowers, ornamental plants, shrubs, trees and other desirable plants. Do not pour spray solutions near desirable plants.
- ◆ Do not use on carpetgrass, dichondra, St. Augustinegrass, bentgrass, nor on lawns or turf where desirable clovers are present.
- Use only lawn-type sprayers. Avoid fine sprays; coarse sprays are less likely to wind drift.
- Do not spray roots of ornamentals and trees.
- Do not exceed specified dosages for any area; be particularly careful within the dripline of trees and other ornamental species.
- Do not apply to newly seeded grasses until well established. Do not spray when air temperatures exceed 85°F. Seed can be sown 3 to 4 weeks after application.
- Do not apply this product through any type of irrigation system.

Application Rates - Apply 8 to 12 pints of product in 20 to 260 gallons of water per acre (3.0 to 4.4 fluid ounces of product in 0.5 to 6 gallons of water per 1,000 square feet). Use higher rates when using the higher volume of water per acre.

The maximum application rate to turf is 0.8 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

Small Area Applications (Not Recommended For Hose End Sprayers) - For spot treatments and small areas, mix Gordon's Cleanout™ Brush and Stump Control at 3.0 fluid ounces per 1.0 gallon of water per 1,000 square feet or follow the recommendations for hand operated sprayers presented below. Spray emerged weeds that are actively growing at any time of the season. On newly established lawns, apply Gordon's Cleanout™ Brush and Stump Control after the grass has been mowed at least 3 times. Do not water the lawn within 24 hours after application and observe use precautions.

Use Rates In Ornamental Lawns and Turf With Hand Operated Sprayers

Amount o	of Product	Amount of Water	Area to be Treated
6 Tablespoons	3.0 fluid ounces	1 Gallon	1,000 Square Feet
12 Tablespoons	6.0 fluid ounces	2 Gallons	2,000 Square Feet
18 Tablespoons	9.0 fluid ounces	3 Gallons	3,000 Square Feet

OPTION (3). Text for Spot Treatments in Noncropland Areas

DIRECTIONS FOR USE

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

(For containers less than 1 gallon):

STORAGE AND DISPOSAL

STORAGE: Store in original container in a locked storage area inaccessible to children.

PESTICIDE DISPOSAL: Securely wrap original container in several layers of newspaper and discard in

trash.

CONTAINER DISPOSAL: Do not reuse container. Rinse thoroughly before discarding in trash.

GENERAL INFORMATION:

This herbicide is intended for spot treatments for the control of broadleaf weeds, vines, and woody plants in noncropland areas. Spot treatments include foliar applications and cut surface-stump applications. This product controls or suppresses the following brush along fencelines, along walkways, on vacant lots, on parking areas, and on farm premises.

BRUSH CONTROLL	ED:		
Ash	Cherry	Oak	
Aspen	Cottonwood	Pine	
Birch	Dogwood	Shortleaf pine	
Blackberry	Elm	Spruce	
Black cherry	Gooseberry	Sumac	
Black locust	Honey locust	Sycamore	
Brambles	Honeysuckle	Wild plum	
Buckbrush	Kudzu	Willow	
Cedar	Multiflora rose		

Bedstraw	Knotweed	Ragweed
Bindweed	Kochia	Sheep sorrel
Black medic	Lambsquarters	Shepherdspurse
Buckhorn	Lespedeza	Smartweed
Burdock	Mallow	Speedwell
Chicory	Morningglory	Spurge
Chickweed	Mustard	Sunflower
Clover	Nettle	Thistles
Cocklebur	Oxalis	Trumpetcreeper
Dandelion	Peppergrass	Velvetleaf
Dock	Pigweed	Wild carrot
Ground ivy	Plantain	Wild garlic
Healall	Poison ivy	Wild lettuce
Henbit	Poison oak	Wild onion
Jimsonweed	Purslane	Yarrow

FOLIAR TREATMENTS:

Foliar applications for mixed brush are effective from full leaf expansion in the spring until leaf drop in the fall. Schedule applications during warm weather when the brush and broadleaf weeds are actively growing. Reduced performance may result with fall treatments following a frost.

Applications should be made on a spray-to-wet basis. All leaves, stems, shoots (suckers) should be thoroughly wetted to the ground. Backpack, knapsack, and hand pump sprayers are suitable for this method.

Mix 3.0 to 5.0 fluid ounces of product in 1.0 gallon of water or prepare a 2.0 to 4.0% (volume/volume) spray solution. Or the equivalent measure is 6 to 10 tablespoons of product per 1.0 gallon of water. Use the higher dosage rates for larger plants, dense growth or adverse conditions.

Refer to Table 1 for additional instructions for spray preparations with water.

Table 1. Mixing instructions for preparing 1.0 to 3.0 gallons of spray solution with water for foliar applications.

Amounts of product required for:			
2.0%	3.0%	4.0%	
3 fluid ounces	4 fluid ounces	5 fluid ounces	
5 fluid ounces	8 fluid ounces	10 fluid ounces	
8 fluid ounces	12 fluid ounces	16 fluid ounces	
	2.0% 3 fluid ounces 5 fluid ounces	2.0% 3.0% 3 fluid ounces 4 fluid ounces 5 fluid ounces 8 fluid ounces	

Allow 5 to 7 days after application before cutting or removal. Additional applications may be needed to control regrowth on resistant species.

CUT SURFACE-STUMP TREATMENTS:

The cut surface treatment is appropriate for tree stumps with diameters larger than 3 to 4 inches. Cut surface treatments are effective throughout the year except when snow, ice or water prevents complete spray coverage.

The whole stump should be sprayed with this product soon after the trees are cut. Spray thoroughly the cut surfaces, bark, and the exposed roots. Treat the entire circumference of the tree stump. Drench until runoff to the soil is noticed. Backpack, knapsack, and hand pump sprayers are suitable equipment.

Mix 20.0 fluid ounces of product with 1.0 gallon of water. Or the equivalent measures are 1¼ pints (2½ cups) of product per 1.0 gallon of water. Mineral oil, kerosene or diesel oil (No. 1 or No. 2 fuel oil) may be substituted for water.

Refer to Table 2 for additional instructions for spray preparations.

Table 2. Mixing instructions for preparing 1.0 to 1.6 gallons of spray solution for cut surface applications.

Amounts of product required for:			
Fluid Ounces	Pints	Cups	
20	11/4	21/2	
32	2	4	
	Fluid Ounces 20	Fluid Ounces Pints 20 11/4	

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

GARLON® 4 Herbicide is a registered trademark of Dow AgroSciences, L.L.C. HY-GRADE I™ is a trademark of CWC Chemical, Inc. Arborchem Basal Oil is a product of Arborchem Products Co. Cide-Kick, Cide-Kick II, and JLB Oil Plus are products of JLB International Chemical, Inc. Androc Oil is a product of Habco, Inc. TRIMEC® is a registered trademark of PBI/Gordon Corporation

APPENDIX

- I. Advertising Claims that may be presented on the container or supplemental labeling:
 - A Brush and Broadleaf Herbicide for Noncropland and Turf
 - Controls ash, aspen, bramble, kudzu, oak, willow, dandelion, chickweed, knotweed, plantain, henbit, spurge and many other species of brush and broadleaf weeds.
 - Controls multiflora rose, bramble, cedar, locust, poison oak, poison ivy, honeysuckle, thistle, kochia, kudzu, and many other trees, vines and broadleaf weeds.