



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 21, 2019

Anne Downs
Senior Registration Specialist
Wilbur-Ellis Company, LLC
2903 S. Cedar Ave.
Fresno, CA 93725

Subject: Notification per PRN 98-10 – change company logo
Product Name: Vendetta Herbicide
EPA Registration Number: 2935-552
Application Date: July 27, 2018
Decision Number: 549230

Dear Ms. Downs:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

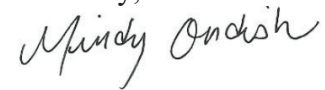
As agreed upon in our 3/20/19 phone discussion, you must submit an application to the Agency to change the primary brand name for this product to “Vendetta” within 30 days of the date of this letter.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

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If you have any questions, please contact me at ondish.mindy@epa.gov or at (703)605-0723.

Sincerely,

A handwritten signature in black ink that reads "Mindy Ondish". The signature is written in a cursive, flowing style.

Mindy Ondish
Acting Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs



FOR CONTROL OF CERTAIN BROADLEAF WEEDS IN SMALL GRAINS (WHEAT, BARLEY, OATS AND RYE), CONSERVATION RESERVE PROGRAM (CRP) AREAS, GRASSES GROWN FOR SEED OR SOD PRODUCTION AND FLAX

ACTIVE INGREDIENTS:	% By Wt.
Octanoic acid ester of bromoxynil (3,5-dibromo-4-Hydroxybenzonitrile)*	31.7%
2-Ethylhexyl ester of 2-methyl-chlorophenoxyacetic acid**	34.0%
OTHER INGREDIENTS***	34.3%
TOTAL:	100.0%

* Bromoxynil octanoate equivalent to 21.8% of bromoxynil or not less than 2.0 pounds of bromoxynil per gallon.

** Equivalent to 21.8% 2-methyl-chlorophenoxyacetic acid or not less than 2.0 pounds MCPA acid per gallon.

***Contains petroleum distillates

NOTIFICATION

2935-552

EPA Reg. No. 2935-552

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

EPA Est. No. 228-IL-1

03/21/2019

**KEEP OUT OF REACH OF CHILDREN
WARNING – AVISO**

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 swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Do not give any liquid to the person • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
If on skin :	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact EMERGENCY TELEPHONE NUMBERS. (800) 424-9300 CHEMTREC (transportation and spills) (800) 222-1222 POISON CONTROL CENTER (human health) (888) 426-4435 ASPCA (animal health)</p>	
<p>NOTE TO PHYSICIAN: Contains petroleum distillate, vomiting may cause aspiration pneumonia.</p>	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Warning: May be fatal if swallowed. Harmful if absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing spray mist.

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical resistant to this product are made of barrier laminate, neoprene rubber, nitrile rubber or viton.

Mixers, loaders, applicators, flaggers, equipment cleaners, and other handlers must wear:

- Coveralls over a long-sleeved shirt and long pants,
- Chemical-resistant gloves such as barrier laminate, neoprene rubber >14 mils, nitrile rubber >14 mils, or viton > 14 mils,
- Chemical-resistant apron when cleaning equipment, mixing, and loading,
- Protective eyewear,
- Chemical-resistant headgear for overhead exposure,
- Chemical-resistant footwear plus socks.

Mixers and loaders supporting aerial application must also wear:

- A Chemical-resistant apron, and
- A NIOSH-approved particulate respirator with any N, R, or P filter with NIOSH approval number prefix TC-84A; or a NIOSH-approved powered air purifying respirator with HE filter with NIOSH approval number prefix TC-21C. It is recommended the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator.

See "Engineering Controls" for additional requirements.

Discard clothing and 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.

ENGINEERING CONTROLS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard(WPS) for agricultural pesticides [40CFR 170.240(d)4-6]), the handler PPE requirements may be reduced or modified as specified in the WPS. **IMPORTANT:** When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment breakdown.

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d) (4-6)].

If you will handle a total of 60 gallons or more of this product per day, you must use a mechanical transfer system for all mixing and loading operations. If this product is packaged in a 30 gallon drum, you must use a mechanical transfer system which terminates in a drip-free hard coupling which may be used only with a spray or mix tank which has been fitted with a compatible coupling. If you do not presently own or have access to a mechanical transfer system with this type of coupling, contact your dealer for information on how to obtain such a system or to modify your present system.

When using a mechanical transfer system, do not remove or disconnect the pump or probe from the container until the container has been emptied and rinsed. The pump or probe system must be used to rinse the empty container and to transfer the rinsate directly to the mixing or spray tank.

Application from a tractor with a completely enclosed cab or aerial application is required whenever this product is applied to 360 or more acres in a day. The closed systems and enclosed cabs must be used 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.

To reduce exposure to residues, wash the spray rig, tractor, and all other equipment used to handle or apply this product with water daily or before using the equipment for any other purpose.

APPLICATION BY CHEMIGATION must be done by fixed pipe, overhead sprinkler systems or hand-moved pipe. If hand-moved pipe is used for chemigation, the pipe must not be handled in any way until 24 hours after chemigation has been completed and residues have been flushed from the system. When applying by chemigation, no person may enter the application site unless in an enclosed vehicle.

DURING AERIAL APPLICATION, human flaggers are prohibited unless in enclosed vehicles. Aerial application is prohibited within 300 feet of residential areas (e.g., homes, schools, hospitals, shopping areas, etc.)

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 pesticide is toxic to fish, aquatic invertebrates and aquatic 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 washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours. This pesticide has properties and characteristics associated with chemicals detected in groundwater. The use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

PHYSICAL AND CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

Use of this product in certain portions of California, Oregon and Washington is subject to the January 22, 2004 Order for injunctive relief with Washington Toxics Coalition, et. al. v. EPA C01-0132C, (W.D. WA). For further information, please refer to <http://www.epa.gov/espp/litstatus/wtc/index.htm>.

Tank Mixing: It is the pesticide user's responsibility to ensure that all products tank-mixed with VENDETTA® HERBICIDE are registered for the intended use. Users must follow the most restrictive directions and precautionary language of the products in the mixture.

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 intervals. 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). For all crops except turf, the REI is 24 hours. The REI for harvesting sod farm turf is 26 days. The REI for other turf activities is 24 hours. For uses on turf grown for transplanting (e.g. on sod farms), notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

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 chemical-resistant gloves made of any waterproof material, coveralls, shoes plus socks and protective eyewear.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to the use of this product on non-residential turfgrass areas that are NOT within the scope of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Do not enter or allow others to enter the treated area until sprays have dried.

USE INFORMATION

VENDETTA HERBICIDE is formulated as an emulsifiable concentrate containing the equivalent of 2 lbs. per gallon of bromoxynil and 2 pounds per gallon of 2-ethylhexyl ester of MCPA.

VENDETTA HERBICIDE is a selective postemergence herbicide for control of important broadleaf weeds infesting small grains (wheat, barley, oats, rye), flax, conservation reserve program areas, and grass grown for seed or sod production. Optimum weed control is obtained when VENDETTA HERBICIDE is applied to actively growing weed seedlings. VENDETTA HERBICIDE is primarily a contact herbicide, therefore thorough coverage of the weed seedlings is essential for optimum control.

VENDETTA HERBICIDE has little residual activity. Therefore subsequent flushes of weeds will not be controlled by the initial treatment. Generally crops that form a good canopy will help shade subsequent weed flushes. However, certain crops or short-straw varieties, for example Yecora Rojo wheat, may not develop the crop canopy fast enough to shade the subsequent flushes of weeds.

Occasional transitory leaf burn may occur. The temporary leaf burn is similar to that seen with liquid fertilizer. Because the activity of VENDETTA HERBICIDE is mainly contact, recovery of the crop is generally rapid with no lasting effect. Frequency and amount of leaf burn may be greater when crops are stressed by abrasive winds, cool to cold evening temperatures or mechanical injury, such as that caused by hail, sleet or insect feeding. To reduce the potential for temporary leaf burn, applications should be made to dry foliage in the recommended spray volumes per acre when weather conditions are not extreme.

IMPORTANT: VENDETTA HERBICIDE contains low volatile 2-ethylhexyl ester of MCPA. At high air or ground surface temperatures, vapors from VENDETTA HERBICIDE may cause injury to susceptible plants. This fact should be considered when applying VENDETTA HERBICIDE.

MIXING, LOADING AND HANDLING INSTRUCTIONS

2.5 Gallon Containers

Special care must be taken in mixing and loading VENDETTA HERBICIDE. Hands should be placed on the container in such a way as to avoid possible drip or splash.

30 Gallon and Bulk Containers

If you will handle a total of 60 gallons or more of VENDETTA HERBICIDE per day, you must use a mechanical transfer system for all mixing and loading operations. If VENDETTA HERBICIDE is packaged in a 30 gallon drum, you must use a mechanical transfer system which terminates in a drip-free hard coupling which may be used only with a spray or mix tank which has been fitted with a compatible coupling. If you do not presently own or have access to a mechanical transfer system with this type of coupling, contact your dealer for information on how to obtain such a system or to modify your present system.

When using a mechanical transfer system, do not remove or disconnect the pump or probe from the container until the container has been emptied and rinsed. The pump or probe system must be used to rinse the empty container and to transfer the rinsate directly to the mixing or spray tank.

VENDETTA HERBICIDE ALONE: Fill the spray tank 1/2 to 3/4 full with clean water. Begin agitation and add the recommended amount of VENDETTA HERBICIDE. Add water to the spray tank to the desired level. Maintain sufficient agitation to ensure a uniform spray mixture during application.

TANK MIXTURES: VENDETTA HERBICIDE can be applied in tank mixture with many other herbicides and insecticides registered for use on approved crops. It is the pesticide user's responsibility to ensure that all products tank-mixed with VENDETTA HERBICIDE, are registered for the intended use. Users must follow the most restrictive directions and precautionary language of the products in the mixture. Refer to the specific crop section for rate recommendations and other restrictions.

To apply VENDETTA HERBICIDE in mixture with another product, fill the spray tank 1/2 to 3/4 full with clean water and begin agitation. If tank mixing with wettable powder, soluble powder, flowable or dry flowable products, add the powder or flowable product first. After the other herbicide is thoroughly mixed with water, add the specified amount of VENDETTA HERBICIDE and add water to the spray tank to the desired level. If tank mixing with other product types, add VENDETTA HERBICIDE first before adding the other product. Always mix one product in water thoroughly before adding another product or compatibility problems may occur. Never mix two products together without first mixing in water.

Maintain sufficient agitation while mixing and during application to ensure a uniform spray mixture. If spray mixture is allowed to remain without agitation for short periods of time, be sure to agitate until uniformly mixed before application.

A compatibility test is recommended to ensure satisfactory spray preparation. To test for compatibility, use a small container and mix a small amount (0.5 to 1 quart) of spray, combining all ingredients in the same ratio as the anticipated use. If any indications of physical incompatibility develop, do not use this mixture for spraying. Indications of incompatibility usually will appear within 5 to 15 minutes after mixing. To ensure maximum crop safety and weed control, follow the most restrictive of the labeling limitations and precautions of all the products used in the tank mixture with VENDETTA HERBICIDE.

SPRAYABLE LIQUID FERTILIZERS AND SPRAY ADDITIVES

VENDETTA HERBICIDE can be applied in combination with sprayable liquid fertilizer or spray additives such as surfactants or crop oil concentrate. When tank mixing with liquid fertilizer always add the fertilizer to the spray tank first and agitate thoroughly before adding VENDETTA HERBICIDE. Always predetermine the compatibility with liquid fertilizer by mixing small proportional quantities in advance. Agitation must be maintained during filling and application operations to ensure that VENDETTA HERBICIDE is evenly mixed with the fertilizer. Leaf burn may occur when VENDETTA HERBICIDE is applied with liquid fertilizer, but new leaves are not adversely affected.

IMPORTANT: Fertilizers and spray additives can increase foliage leaf burn when applied with VENDETTA HERBICIDE. Do not apply fertilizers or spray additives with VENDETTA HERBICIDE if leaf burn is a major concern due to environmental conditions, crop or variety sensitivity to VENDETTA HERBICIDE.

APPLICATION PROCEDURES

VENDETTA HERBICIDE can be applied to registered use areas by ground, aerial and sprinkler irrigation equipment.

GROUND APPLICATION

Use a standard herbicide boom sprayer that provides uniform and accurate application. Sprayer must be equipped with screens no finer than 50 mesh in the nozzle tips and in-line strainers.

Select a spray volume and delivery system that will ensure thorough and uniform spray coverage. For optimum spray distribution and thorough coverage use of flat fan nozzles (maximum tip size 8008) with a spray pressure of 40-60 psi are recommended.

Other nozzle types and lower spray pressures that produce coarse spray droplets may not provide adequate coverage of the weeds to ensure optimum control. Raindrop® nozzles and flood nozzles are not recommended as weed control with VENDETTA HERBICIDE may be reduced.

A spray volume of 10 to 20 gallons per acre (GPA) is recommended for optimum spray coverage. A minimum of 5 GPA with a minimum spray pressure of 50 psi and a maximum ground speed of 10 mph may be used with higher speed, low volume ground application if ground terrain, crop and weed density allow effective spray distribution. When using higher speed equipment, a maximum ground speed of 10 mph is suggested if field conditions cause excessive boom movement during application which results in poor spray coverage. Ground applications made when dry, dusty field conditions exist may provide reduced weed control in wheel track areas. Applications using less than 10 gallons per acre may result in reduced weed control.

When weed infestations are heavy, use of higher spray volumes and spray pressure will be helpful in obtaining uniform weed coverage. If you are unsure of the infestation level or size of crop, consult your local extension service.

Do not apply when winds are gusty or when other conditions favor poor spray coverage and/or off target spray movement.

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

AERIAL APPLICATION

Use orifice discs, cores and nozzle types and arrangements that will provide for optimum spray distribution and maximum coverage. A minimum spray volume of 5 GPA and a maximum pressure of 40 psi are recommended. A minimum spray volume of 3 gallons per acre may be used if crop canopy and weed density allow adequate spray coverage. Aerial applications using less than 5 gallons of spray volume per acre may result in reduced weed control.

Do not apply during inversion conditions, when winds are gusty or when other conditions favor poor spray coverage and/or off-target spray movement. Off-target spray movement can be minimized by increasing the spray volume per acre and not applying when winds exceed 10 mph.

Nozzles must always point backward parallel with the airstream and never point downwards more than 45 degrees.

SPRINKLER IRRIGATION APPLICATION

VENDETTA HERBICIDE can be applied through sprinkler irrigation systems to small grains and grasses grown for seed or sod production.

Apply VENDETTA HERBICIDE through sprinkler systems including center pivot, lateral move, side (wheel) roll, solid set or hand move irrigation systems only. If hand moved pipe is used for chemigation, the pipe must not be handled in any way until 24 hours after chemigation has been completed and residues have been flushed from the system. When applying by chemigation, no person may enter the application site unless in an enclosed vehicle. Do not apply VENDETTA HERBICIDE through any other type of irrigation system.

SPECIFIC REQUIREMENTS FOR APPLICATION THROUGH AUTOMATED SPRINKLER IRRIGATION SYSTEM

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Do not apply when wind speed favors drift beyond the area intended for treatment.
8. Agitation is recommended in the pesticide supply tank when applying VENDETTA HERBICIDE.
9. VENDETTA HERBICIDE should be applied continuously for the duration of the water application with center pivot and continuous lateral move systems. Application of VENDETTA HERBICIDE should be made during the last 30-45 minutes of the irrigation set with other overhead sprinkler systems.
10. For best performance, set the sprinkler system to deliver approximately 0.5 inch or less of water per acre.
11. Remove scale, pesticide residues and other foreign matter from the supply tank and entire injector system. Flush with clean water.
12. If VENDETTA HERBICIDE is diluted in the supply tank, fill the tank with half of the water amount desired, add VENDETTA HERBICIDE and then add remaining water amount with agitation. Always dilute with at least 4 parts water to 1 part VENDETTA HERBICIDE.
13. Start the sprinklers and then inject VENDETTA HERBICIDE into the irrigation line. VENDETTA HERBICIDE should be injected with a positive displacement pump into the main line at least 8 feet ahead of a right angle turn to insure adequate mixing. Refer to VENDETTA HERBICIDE label for detailed information on application rates and timings.

CHEMIGATION USER PRECAUTIONS

Application of more than 0.5 inch/acre of irrigation water may result in decreased product performance on certain soils.

Do not apply when conditions favor drift, when system connections or fittings leak, or when nozzles do not provide uniform distribution.

Allow sufficient time for pesticide to be flushed through all the lines and nozzles before turning off irrigation water.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.

Do not connect an irrigation system used for pesticide application to a public water system.

If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

A person knowledgeable of the chemigation system and responsible for its operations, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRAY DRIFT MANAGEMENT

SENSITIVE AREAS: The pesticide must only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment and weather-related factors determines the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

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.

Apply only when wind speed is 2-10 mph at the application site.

The following drift management requirements must be followed to avoid off target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulation.

FOR AERIAL APPLICATION:

- The distance of the outermost nozzles on the boom must not exceed 3/4 the length of the wingspan or 90% of rotor blade diameter.
- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.
- Apply only when wind speed is 2-10 mph at the application site.

FOR GROUND BOOM APPLICATION:

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

Where states have more stringent regulations, they must be observed. The applicator should be familiar with and take into account the information covered in the [Aerial Drift Reduction Advisory Information](#).

INFORMATION ON DROPLET SIZE: (This section is advisory in nature and does not supersede the mandatory label requirements).

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions below).

CONTROLLING DROPLET SIZE: (This section is advisory in nature and does not supersede the mandatory label requirements.)

- Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- Number of nozzles - Use the minimum number of nozzles that provide uniform coverage.
- Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the air stream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

BOOM LENGTH: (This section is advisory in nature and does not supersede the mandatory label requirements.)

For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or 90% of rotor length may further reduce drift without reducing swath width.

APPLICATION HEIGHT: (This section is advisory in nature and does not supersede the mandatory label requirements.)

Applications must not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

SWATH ADJUSTMENT: (This section is advisory in nature and does not supersede the mandatory label requirements.)

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller drops, etc.)

WIND: (This section is advisory in nature and does not supersede the mandatory label requirements.)

Drift potential is lowest between wind speeds of 2 - 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application must be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY: (This section is advisory in nature and does not supersede the mandatory label requirements.)

When making application in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS: (This section is advisory in nature and does not supersede the mandatory label requirements.)

Applications must not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

PLANT BACK INTERVAL

For crops on this label, or crops with an established MCPA tolerance, there is a 30-day plant back interval (PBI). For crops not listed on a MCPA label, or on crops for which no residue tolerances for MCPA have been established, a 60-day plant back interval must be observed.

RESISTANCE MANAGEMENT

VENDETTA HERBICIDE contains a Group 4 and a Group 6 herbicide. Any weed population may contain or develop plants naturally resistant to Group 4 and Group 6 herbicides. Weed species with acquired resistance to Group 4 and Group 6 herbicides may eventually dominate the weed population if other Group 4 and Group 6 herbicides are repeatedly used in successive years or in the same field as the primary method of control for targeted species. VENDETTA HERBICIDE should be rotated with products that do not contain MCPA or bromoxynil to minimize selection pressure.

To delay herbicide resistance, practice effective resistance management:

- Avoid the consecutive use of VENDETTA HERBICIDE or other Group 4 and Group 6 herbicides.
- Use tank mixes or premixes with herbicides from different target site of action Groups.
- Base herbicide use on a comprehensive IPM program.
- Monitor treated weed populations for loss of field efficacy.
- Contact your local extension specialist, certified crop advisors, and/or manufacturer for herbicide resistance management.

WEED LIST

Postemergence application of VENDETTA HERBICIDE will control the following weeds when sprayed in the seedling stage. Maximum weed stage of growth are listed under the VENDETTA HERBICIDE Directions tables.

MOST SUSCEPTIBLE BROADLEAF WEED SPECIES

Annual sowthistle	(<i>Sonchus oleraceus</i>)
Black mustard	(<i>Brassica nigra</i>)
Black nightshade	(<i>Solanum nigrum</i>)
Common cocklebur	(<i>Xanthium strumarium</i>)
Common lambsquarters	(<i>Chenopodium album</i>)
Common tarweed	(<i>Hemizonia congesta</i>)
Cow cockle	(<i>Saponaria vaccaria</i>)
Cutleaf nightshade	(<i>Solanum triflorum</i>)
Eastern black nightshade	(<i>Solanum ptycanthum</i>)
Coast fiddleneck	(<i>Amsinckia intermedia</i>)
Field pennycress	(<i>Thlaspi arvense</i>)
Green smartweed	(<i>Polygonum scabrum</i>)
Hairy nightshade	(<i>Solanum sarachoides</i>)
Horned Poppy	(<i>Glaucium corniculatum</i>)
Jimsonweed	(<i>Datura stramonium</i>)
Ladysthumb	(<i>Polygonum persicaria</i>)
Lanceleaf sage	(<i>Salvia reflexa</i>)
London rocket	(<i>Sisymbrium irio</i>)
Marshelder	(<i>Iva xanthifolia</i>)
Pennsylvania smartweed	(<i>Polygonum strumarium</i>)
Pepperweed spp.	(<i>Lepidium</i> app.)
Redroot pigweed	(<i>Amaranthus retroflexus</i>)
Russian thistle	(<i>Salsola kali</i>)
Shepherdspurse	(<i>Capsella bursa-pastoris</i>)
Silverleaf nightshade	(<i>Solanum elaeagnifolium</i>)
Smooth pigweed	(<i>Amaranthus hybridus</i>)
Spiny pigweed	(<i>Amaranthus spinosus</i>)
Sunflower ¹	(<i>Helianthus annuus</i>)
Tall Waterhemp	(<i>Amaranthus tuberculatus</i>)
Tartary buckwheat	(<i>Fagopyrum tataricum</i>)
Tumble mustard	(<i>Sisymbrium altissimum</i>)
Wild buckwheat	(<i>Polygonum convolvulus</i>)
Wild mustard	(<i>Sinapis arvensis</i>)
Yellow rocket	(<i>Barbarea vulgaris</i>)

¹ For control of sunflower, delay application until first sunflower seedlings emerging are 4 inches in height.

SUSCEPTIBLE BROADLEAF WEED SPECIES

Blue (purple) mustard	(<i>Chlorispora tenella</i>)
Common groundsel	(<i>Senecio vulgaris</i>)
Common ragweed	(<i>Ambrosia artemisiifolia</i>)
Corn chamomile	(<i>Anthemis arvensis</i>)
Corn gromwel	(<i>Lithospermum arvense</i>)
Fumitory	(<i>Fumaria officinalis</i>)
Giant ragweed	(<i>Ambrosia trifida</i>)
Hemp sesbania	(<i>Sesbania exaltata</i>)
Henbit	(<i>Lamium amplexicaule</i>)
Ivyleaf morningglory	(<i>Ipomoea hederacea</i>)
Knawel	(<i>Scleranthus annuus</i>)
Kochia	(<i>Kochia scoparia</i>)
Mayweed	(<i>Anthemis cotula</i>)
Prostrate knotweed	(<i>Polygonum aviculare</i>)
Puncture vine	(<i>Tribulus terrestris</i>)
Tall morningglory	(<i>Ipomoea purpurea</i>)
Tansy mustard	(<i>Descurainia pinnata</i>)
Tarweed	(<i>Hemizonia</i> spp.)
Velvetleaf	(<i>Abutilon theophrasti</i>)
Wild radish	(<i>Raphanus raphanistrum</i>)

Weeds germinating after spraying will not be controlled.

WEED SUPPRESSION

Canada Thistle

(*Cirsium arvense*)

VENDETTA HERBICIDE applied at 1-1/2 pints per acre provides burn down of top growth. Regrowth may occur. Make applications when Canada thistle is 8 inches tall to the bud stage.

WHEAT, BARLEY, OATS AND RYE
VENDETTA HERBICIDE DIRECTIONS

		APPLICATION TIMING AND SPECIFIC COMMENTS	
PRODUCT	RATE	CROP	WEEDS
VENDETTA HERBICIDE	1 pint/A	Fall seeded wheat, barley, oats and rye throughout the United States and spring seeded wheat, barley, oats and rye in Idaho, Oregon, Washington, Colorado, Wyoming and Montana. Apply to wheat, barley, oats and rye from the 3-leaf stage but before the crop reaches the boot stage.	MOST SUSCEPTIBLE BROADLEAF WEEDS: Apply to weeds up to the 8-leaf stage or 4 inches in height, whichever comes first. If weed forms rosette, apply before weeds exceed 2 inches in diameter.
	1-1/2 to 2 pints/A		SUSCEPTIBLE BROADLEAF WEEDS: Apply to weeds up to the 4-leaf stage or 2 inches in height, whichever comes first. If weed forms rosette, apply before weeds exceed 1 inch in diameter.
	2 pints/A		Apply to henbit, knawel and mayweed up to the 4-leaf stage or 2 inches in height, whichever comes first. Apply to kochia and tansy mustard for improved control when these weeds exceed the recommended stage of growth or are growing under cool, dry conditions.
	1-1/2 pints/A		Spring seeded wheat and barley except Idaho, Oregon, Washington, Colorado, Montana, and Wyoming. Apply to wheat, barley, oats and rye from the 3-leaf stage but before the crop reaches the boot stage.
	1-1/2 to 2 pints/A	Spring seeded wheat and barley except Idaho, Oregon, Washington, Colorado, Montana, and Wyoming. Apply to wheat, barley, oats and rye from the 3-leaf stage but before the crop reaches the boot stage.	MOST SUSCEPTIBLE AND SUSCEPTIBLE BROADLEAF WEEDS: Apply to weeds that do not exceed the 8-leaf stage or 4 inches in height, whichever comes first. If weed forms rosette, apply before weeds exceed 2 inches in diameter. Apply to kochia up to 2 inches in height.
	1-1/2 to 2 pints/A	Spring seeded wheat and barley except Idaho, Oregon, Washington, Colorado, Montana, and Wyoming. Apply to wheat, barley, oats and rye from the 3-leaf stage but before the crop reaches the boot stage.	Apply to kochia that is 2-4 inches height.

	Chemigation Only 2 pints/A	Apply to wheat, barley, oats and rye from the 3-leaf stage but before the boot stage. Apply through automated sprinkler irrigation systems with mechanical transfer loading system only. See MIXING LOADING AND HANDLING INSTRUCTIONS section for complete details.	Apply to MOST SUSCEPTIBLE and SUSCEPTIBLE broadleaf weeds up to the 4-leaf stage, 2 inches in height or 1 inch in diameter, whichever comes first.
	Post-harvest 3/4 to 2 pints/A	Make applications following harvest of wheat, barley, oats and rye in the states of North Dakota, South Dakota, Minnesota, and Montana. Do not plant any rotational crop until the following use season.	Apply 3/4 to 1 pint/A to MOST SUSCEPTIBLE BROADLEAF WEEDS up to the 8-leaf stage or 4 inches in height, whichever comes first. Apply 1-1/2 to 2 pints/A to SUSCEPTIBLE BROADLEAF WEEDS up to the 4-leaf stage or 2 inches in height, whichever comes first.

RESTRICTIONS: WHEAT, BARLEY, OATS AND RYE

- Do not graze treated fields within 45 days after application.
- Do not apply when crops are under moisture stress.
- Do not apply when crop canopy covers the weeds as poor control will result.
- Apply up to Boot stage.
- Do not apply more than 2 pints of VENDETTA HERBICIDE (0.5 lb. MCPA acid equivalent) per acre in a single growing season.
- For crops on this label, or crops with an established MCPA tolerance, there is a 30-day PBI. For crops not listed on a MCPA label, or on crops for which no residue tolerances for MCPA have been established, a 60-day plant back interval must be observed.
- Do not apply more than 0.75 lb. of MCPA acid equivalent per acre per year from all combined sources.

PRECAUTIONS: WHEAT, BARLEY, OATS AND RYE

- Reduced weed control may occur when weeds are stressed from lack of moisture or cold temperatures.
- Refer to labels of products used in tank mixture for additional restrictions and precautions.

**CONSERVATION RESERVE PROGRAM AREAS (CRP)
VENDETTA HERBICIDE DIRECTIONS**

PRODUCT	RATE	APPLICATION TIMING AND SPECIFIC COMMENTS	
		CROP	WEEDS
VENDETTA HERBICIDE	1 to 2 pints/A	Apply to grasses from the 3 leaf stage.	Apply 1 pint/A to MOST SUSCEPTIBLE and 1-1/2 to 2 pints/A to SUSCEPTIBLE broadleaf weeds up to the 8-leaf stage, 4 inches in height or 2 inches in diameter, whichever comes first.

RESTRICTIONS: CRP AREAS

- Do not allow livestock to graze in treated areas or feed treated grass to livestock.
- Do not apply VENDETTA HERBICIDE to CRP areas planted with alfalfa if temperatures are expected to exceed 80° F or severe crop injury may occur. If legumes other than alfalfa have been planted, severe crop injury may occur at any application temperature.
- Do not apply more than 2 pints/A of VENDETTA HERBICIDE to CRP areas that are under seeded with alfalfa.

**GRASSES GROWN FOR SEED PRODUCTION OR SOD PRODUCTION
VENDETTA HERBICIDE DIRECTIONS
Seedling and Established Grasses**

PRODUCT	RATE PER ACRE	APPLICATION TIMING AND SPECIFIC COMMENTS		
		RATE PER 1000 SQ. FT.	CROP	WEEDS
VENDETTA HERBICIDE	1 to 2 pints	0.375 to 0.73 fl. oz.	Apply to established and newly seeded grasses grown for seed or sod production before the boot stage. Established grasses tolerant to VENDETTA HERBICIDE include bentgrasses, Kentucky Bluegrass, Fescues, Ryegrass, Bermudagrass, St. Augustinegrass and Zoysiagrass. VENDETTA HERBICIDE may also be used on seedling grasses such as Merion, Park, Delta, or common Kentucky Bluegrasses, Pennlawn, Chewings, Illahee or Alta Fescues, Orchard grass, Highland, Seaside	Refer to the WEED LIST for a listing of susceptible broadleaf weeds. Optimal control will be attained when weeds are treated in the seedling stage (less than 4 leaf stage, 2 inches in height, or 1 inch in diameter.)

			or Astoria Bentgrasses, perennial Ryegrasses, Bahiagrass and Zoysiagrass.	
VENDETTA HERBICIDE	Chemigation 2 pints/A only	0.73 fl. oz.	Apply to established and newly seeded grasses grown for seed or sod production before the boot stage. Apply through automated sprinkler irrigation systems with mechanical transfer loading system only. See MIXING, LOADING AND HANDLING INSTRUCTIONS section for complete details. Refer to the list of established grasses that are tolerant to VENDETTA HERBICIDE.	

RESTRICTIONS: Grasses grown for seed or sod production

- Not for use on residential turf.
- Do not apply with backpack or handheld application equipment.
- Do not allow livestock to graze in treated areas or feed treated grasses to livestock.
- Do not apply more than 2 pints of VENDETTA HERBICIDE (0.5 lb. MCPA acid equivalent) per acre in a single growing season.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- Do not apply more than 1.5 lbs. acid equivalent MCPA per acre per year from all combined sources.

**FLAX (*Linum usitatissimum* only)
VENDETTA HERBICIDE DIRECTIONS**

PRODUCT	RATE	APPLICATION TIMING AND SPECIFIC COMMENTS	
		CROP	WEEDS
VENDETTA HERBICIDE	0.5 to 0.9 pints/A	Apply to flax that is 2 to 8 inches in height. Do not apply VENDETTA HERBICIDE to flax during or after the bud stage.	Apply to MOST SUSCEPTIBLE weeds that do not exceed the 4-leaf stage, 2 inches in height or 1 inch in diameter, whichever comes first.

RESTRICTIONS: FLAX (*Linum usitatissimum* only)

- Do not apply if temperatures are expected to exceed 85° F at application or 3 days following application or crop injury may occur.
- Unless otherwise instructed, do not apply Vendetta Herbicide to flax with crop oil concentrate, surfactants or nitrogen solutions.

- Do not use on ornamental flax.
- Do not apply more than 0.9 pints of VENDETTA HERBICIDE (0.225 lb. MCPA acid equivalent) per acre in a single growing season.
- For crops on this label, or crops with an established MCPA tolerance, there is a 30-day PBI. For crops not listed on a MCPA label, or on crops for which no residue tolerances for MCPA have been established, a 60-day plant back interval must be observed.
- Do not exceed 0.25 lb. acid equivalent of MCPA per acre per year.

PRECAUTIONS: FLAX (*Linum usitatissimum* only)

- Unacceptable crop injury may occur following VENDETTA HERBICIDE application to flax grown on high organic, peat type soils.
- Application under high humidity conditions can injure flax.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Always store pesticides in the original closed container in a secure storage area. Store pesticides away from food, pet food, feed, seed, fertilizers, and veterinary supplies. Protect pesticide containers from extreme heat and cold.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

Non-refillable containers (2.5, 30 & 55 gallons): Do not reuse or refill this container. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. 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.

(Non-refillable <5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 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. Repeat this procedure two more times.

(Non-refillable >5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 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 or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use for disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable container (15 gallons, 30 gallons, 120 gallons and greater or bulk): Refill this container with 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 the 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 process two more times

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