

42750-91 2.15.2008

1/19



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 15 2008

FEB 15 2008

NOTIFICATION

Morris Gaskins
Registrations Manager
Albaugh Inc.
P.O. Box 2127
Valdosta, GA 31604-2127

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Mr. Gaskins:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated February 5, 2008 for:

EPA Registration 42750-91
EPA Registration 42750-25

Clopyralid Acid + MCPA Ester
Solve MCPA Ester

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4.

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

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

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

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-91	2. EPA Product Manager E. Kraft	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Clopyralid + MCPA Ester	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

NOTIFICATION
FEB 15 2008

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container.		4. Size(s) Retail Container 2.5, 30, 250 bulk		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3288	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date February 5, 2008			

3/19

CORPORATE OFFICE

1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 - Office
300.247.8013 - Toll Free
515.964.7813 - Facsimile

ALBAUGH, INC.

Valdosta Office

P.O. Box 2127
304 Janet Street, Suite H
Valdosta, GA 31604
229.244.3288 - Office
229.244.5841 - Facsimile

FED-X

February 5, 2008

Document Processing Disk (NOTIFY)
Office of pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

RE: Label notification for "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment"

Dear Sirs,

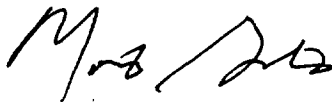
The enclosed submissions are draft labels submitted in response to Pesticide Regulation Notice 2007-4 for the following Albaugh registrations:

PRODUCT	EPA REG. NO.
Clopyralid Acid + MCPA Ester	42750-91
Solve MCPA Ester	42750-25

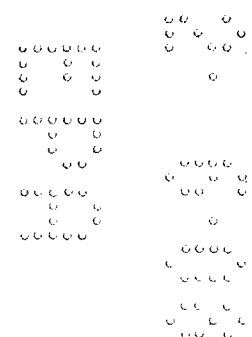
Changes are noted in strikeout for deleted text and underline/bold for added text.

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

NOTIFICATION

FEB 15 2008

EDITOR's NOTE: Marked draft for PR Notice 2007-4 Container Disposal label notification 2/5/08

CLOPYRALID ACID + MCPA ESTER

For selective control of broadleaf weeds in wheat, barley, oats and flax not underseeded with a legume, grasses grown for seed, rangeland, permanent grass pastures, and Conservation Reserve Program (CRP) acres.

ACTIVE INGREDIENT(S):

Clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid	5.0%
MCPA-EHE: 2-methyl-4-chlorophenoxyacetic acid, 2-ethylhexyl ester	43.4%
INERT INGREDIENTS:	51.6%
TOTAL:	100.0%

Contains Petroleum Distillates

Acid Equivalents:

clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid - 5.0% (0.42 lb/gal)

MCPA: 2-methyl-4-chlorophenoxyacetic acid - 27.8% (2.35 lb/gal)

KEEP OUT OF REACH OF CHILDREN

CAUTION PRECAUCION

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.)

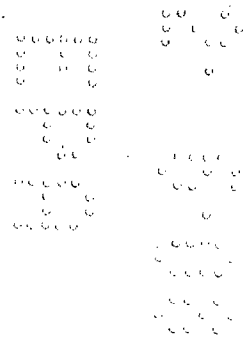
FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<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 SWALLOWED:	<ul style="list-style-type: none"> Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
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 mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
Note to Physician: Contains petroleum distillate. Vomiting may cause aspiration pneumonia.	

EPA File Symbol 42750-91

EPA Est. No. 42750-MO-001

NET CONTENTS: 2.5 gallons

MANUFACTURED BY:
Albaugh, Inc.
Ankeny, IA 50021



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes Moderate Eye Irritation • Harmful If Swallowed, Inhaled, or Absorbed Through Skin

Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category B on an EPA chemical resistance category selections chart.

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

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves, such as barrier laminate or butyl rubber
- Shoes plus socks, and

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH approved particulate filtering respirator equipped with any N, R, or P class filter media with NIOSH approval number prefix TC-84A. It is recommended that the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator.

See engineering controls for additional requirements.

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 STATEMENTS

When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protections 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:

1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
2. Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
3. 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.

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
- Chemical-resistant gloves made of any waterproof material,
- Shoes plus socks

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard 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.

Entry Restrictions for Non-WPS Uses: When applied to rangeland and permanent pastures, keep unprotected persons out of treated areas until sprays have dried.

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

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store above 10 F or warm and agitate before use.

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

~~CONTAINER DISPOSAL: Metal Container Disposal: Do not reuse container. Triple rinse (or equivalent). Then offer for recycling, or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.~~

~~Plastic Container Disposal: Do not reuse container. Triple rinse (or equivalent). Then offer for recycling, or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.~~

CONTAINER DISPOSAL: Non-refillable containers (1, 2.5, 30 & 55 gallon): Do not reuse or refill this container. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

(non-refillable <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. 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 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. 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 (250 gallon & 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 rinseate into application equipment or rinsate collection system. Repeat this rinsing process two more times.

GENERAL INFORMATION

Clopyralid Acid + MCPA Ester herbicide maybe used for selective control of broadleaf weeds in wheat, barley, oats and flax not underseeded with a legume, grasses grown for seed, rangeland, permanent grass pastures, and Conservation Reserve Program (CRP) acres.

PRECAUTIONS AND RESTRICTIONS

- Do not exceed a cumulative amount of 0.25 lb active ingredient (a.i.) of clopyralid per acre per single crop year except in the state of New York (see New York Restrictions above).
- Do not contaminate irrigation ditches or water used for irrigation or domestic purposes.
- Do not use in greenhouses.
- Chemigation: Do not apply this product through any type of irrigation system.
- Many forbs (desirable broadleaf forage plants) are susceptible to Clopyralid Acid + MCPA Ester. Do not spray pastures containing desirable forbs, especially legumes, unless injury can be tolerated. However, the stand and growth of established perennial grasses is usually improved after spraying, especially when rainfall is adequate and grazing is deferred.
- Do not use on newly seeded areas until grass is well established as indicated by vigorous growth and development of tillers and secondary roots.
- Do not use on bentgrass.

- Apply only once per crop cycle, except for grasses grown for seed (see specific use directions).
- Grazing Restriction for Rangeland and Grass Pastures: Do not forage or graze meat animals on treated areas within 7 days of slaughter. Do not forage or graze dairy animals on treated areas within 7 days after treatment.
- Do not transfer livestock from treated grazing areas (or feeding of treated hay) to sensitive broadleaf crop areas without first allowing 7 days of grazing on an untreated pasture (or feeding of treated hay). If livestock are transferred within less than 7 days of grazing untreated pasture or eating untreated hay, urine and manure may contain enough clopyralid to cause injury to sensitive broadleaf plants.
- Field Bioassay Instructions: In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample field conditions such as soil texture, soil pH, drainage, and any other variable that could affect the seed bed of the new crop. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended rotational crop. Observe the test crop for herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the test rotational crop; plant only a labeled crop or crop listed in the table below for which the rotational interval has clearly been met.

CROP ROTATION INTERVALS

Residues of Clopyralid Acid + MCPA Ester in treated plant tissues, including the treated crop or weeds, which have not decayed may affect succeeding susceptible crops.

Crop Rotation Intervals for All States Except Idaho, Nevada, Oregon, Utah and Washington

Note: Numbers in parenthesis and * refer to footnotes following tables.

Rotation Crops (1)	Rotation Interval* (Soils greater than 2% organic matter AND rainfall more than 15 inches during 12 months following application)	Rotation Interval* (Soils less than 2% organic matter AND rainfall less than 15 inches during 12 months following application)
barley, field corn, grasses, oats, wheat	30 days	30 days
canola (rapeseed), flax, sugar beets	5 months	5 months
alfalfa, asparagus, cole crops, dry beans, grain sorghum, mint, onions, popcorn, safflower, soybeans, strawberries, sunflowers, sweet corn	10.5 months	18 months (2)
lentils, peas, potatoes (including potatoes grown for seed), and broadleaf crops grown for seed (excluding Brassica species)	18 months (2, 3)	18 months (2, 3)

1. A field bioassay should be done prior to planting any broadleaf crops that are not listed. Do not rotate to unlisted crops prior to 10.5 months following application.
2. An 18-month crop rotation is recommended due to the potential for crop injury. Note: For these crops, a minimum 10.5 month rotation interval must be observed to avoid illegal residues in the harvested crop.
3. The potential for injury may be reduced by burning, removal, or incorporation of treated crop residues followed by a minimum of 2 supplemental fall irrigations.

Crop Rotation Intervals for Idaho, Nevada, Oregon, Utah and Washington Only

Rotation Crops (1)	Rotation Interval * (Soils greater than 2% organic matter AND rainfall more than 15 inches during 12 months following application)	Rotation Interval * (Soils less than 2% organic matter AND rainfall less than 15 inches during 12 months following application)
barley, field corn, grasses, oats, wheat	30 days	30 days
canola (rapeseed), flax, sugar beets	5 months	5 months
asparagus, Brassica species grown for seed, cole crops, grain sorghum, mint, onions, popcorn, strawberries, sweet corn	12 months	12 months
alfalfa, dry beans, soybeans, sunflowers	12 months	18 months (2)
lentils, peas, potatoes (including potatoes grown for seed), safflower, and broadleaf crops grown for seed (excluding Brassica species)	18 months (2)	18 months (2, 3)

1. A field bioassay should be done prior to planting any broadleaf crops that are not listed. Do not rotate to unlisted crops prior to 12 months following application.
2. An 18-month crop rotation is recommended due to the potential for crop injury. Note: For these crops, a minimum 12 month rotation interval must be observed to avoid illegal residues in the harvested crop.
3. Crop injury and/or yield loss may occur up to 4 years after application. A field bioassay is also recommended prior to planting these sensitive crops. See instructions below.

* Note: The above intervals are based on average annual precipitation, regardless of irrigation practices. Observance of recommended crop rotation intervals should result in adequate safety to rotational crops. However, Clopyralid Acid + MCPA Ester is dissipated in the soil by microbial activity and the rate of microbial activity is dependent on several interrelating factors including soil moisture, temperature and organic matter. Therefore, accurate prediction of rotational crop safety is not possible. In areas of low organic matter (<2.0%) and less than 15 inches average annual precipitation, potential for crop injury may be reduced by burning or removal of plant residues, supplemental fall irrigation and deep moldboard plowing prior to planting the sensitive crop.

SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine 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.

FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% 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.

FOR GROUND BOOM APPLICATION:

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

SWATH ADJUSTMENT: When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

TEMPERATURE INVERSIONS: Do not make applications during a temperature inversion because drift potential is high.

SENSITIVE AREAS: The pesticide should 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).

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

AVOIDING INJURY TO NON-TARGET PLANTS

This product can affect susceptible broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Therefore, do not apply Clopyralid Acid + MCPA Ester directly to, or allow spray drift to come in contact with, vegetables, flowers, grapes, tomatoes, potatoes, beans, lentils, peas, alfalfa, sunflowers, soybeans, safflower, or other desirable broadleaf crops and ornamental plants or soil where these sensitive crops will be planted the same season.

Residues In Plants or Manure: Do not use plant residues, including hay or straw from treated areas, or manure or bedding straw from animals that have grazed or consumed forage from treated areas, for composting or mulching, where susceptible plants may be grown the following season. Do not spread manure from animals that have grazed or consumed forage or hay from treated areas on land used for growing susceptible broadleaf crops. To promote herbicidal decomposition, plant residues should be evenly incorporated or burned. Breakdown of clopyralid in crop residues or manure is more rapid under warm, moist soil conditions and may be enhanced by supplemental irrigation.

Avoid Movement of Treated Soil

Avoid conditions under which soil from treated areas may be moved or blown to areas containing susceptible plants. Wind-blown dust containing clopyralid may produce visible symptoms, such as epinasty (downward curving or twisting of leaf petioles or stems) when deposited on susceptible plants; however, serious injury is unlikely. To minimize potential movement of clopyralid on wind-blown dust,

avoid treatment of powdery dry or light sandy soils until soil is settled by rainfall or irrigation or irrigation shortly after application.

Avoid Spray Drift

Avoid spray drift since very small quantities of the spray, which may not be visible, may severely injure susceptible crops during active growth or dormant periods. Use coarse sprays to minimize drift. To aid in further reducing drift, a drift control or deposition agent suitable for agricultural use may be used with this product. If used, follow all use recommendations and precautions on the product label.

Ground Application: With ground equipment, spray drift can be lessened by keeping the spray boom as low as possible, by applying 10 gallons or more of spray per acre, by keeping the operating spray pressures at the manufacturer's minimum recommended pressures for the specified nozzle type used (low pressure nozzles are available from spray equipment manufacturers), and by spraying when the wind velocity is low (follow state regulations). Avoid application under completely calm conditions which may be conducive to air inversion. In hand-gun applications, select the minimum pressure required to obtain adequate plant coverage without forming a mist. Do not apply with a mist blower.

Aerial Application: With aircraft, drift can be lessened by using straight stream nozzles directed straight back; by using a spray boom no longer than 3/4 the wing span of the aircraft; by using drift control systems or drift control additives; and, by keeping spray pressures low enough to provide coarse spray droplets. Do not use a thickening agent with the Microfoil or Thru-Valve booms, or other systems that cannot accommodate thick sprays. Spray only when wind velocity is low (follow state regulations). Avoid calm conditions which may be conducive to air inversions.

Do not apply by aircraft when an air temperature inversion exists.

Such a condition is characterized by little or no wind and lower air temperature near the ground than at higher levels. The use of a smoke device on the aircraft or continuous smoke column at or near site of application will indicate air direction and velocity, and whether a temperature inversion is present, as indicated by horizontal layering of the smoke.

SPRAYER CLEAN-OUT

To avoid injury to desirable plants, equipment used to apply Clopyralid Acid + MCPA Ester should be thoroughly cleaned before re-using to apply any other chemicals.

1. Rinse and flush application equipment thoroughly at least 3 times with water after use. Dispose of rinse water by application to treatment area or in non-cropland area away from water supplies.
2. During the second rinse, add 1 qt of household ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15-20 minutes). Let the solution stand for several hours, preferably overnight.
3. Flush the solution out of the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Remove nozzles and screens and clean separately.

MIXING INSTRUCTIONS

1. Add 3/4 of the required spray volume to the spray tank and start agitation.
2. Add the required amount of Clopyralid Acid + MCPA Ester.
3. Add any surfactants, adjuvants or drift control agents according to manufacturer's label.
4. Agitate during final filling of the spray tank and maintain sufficient agitation during application to ensure uniformity of the spray mixture.

Note: Allow time for thorough mixing of each spray ingredient before adding the next. If allowed to stand after mixing, agitate spray mixture before use.

Tank Mixing

This product may be applied in tank mix combination with labeled rates of other products provided (1) the tank mix product is labeled for the timing and method of application for the use site to be treated; and (2) tank mixing is not prohibited by the label of the tank mix product.

Tank Mixing Precautions:

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed specified application rates. Do not tank mix with another pesticide product that contains the same active ingredient as this product unless the label of either tank mix partner specifies the maximum dosages that may be used.
- For products packaged in water soluble packaging, do not tank mix with products containing boron or mix in equipment previously used to apply a product mixture containing boron unless the tank and spray equipment has been adequately cleaned. (See instructions for Sprayer Clean-Out.)
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.

Tank Mix Compatibility Testing: A jar test should be done prior to tank mixing to ensure compatibility of Clopyralid Acid + MCPA Ester and other pesticides. Use a clear glass quart jar with lid and mix the tank mix ingredients in the required order and their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, jels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination should not be used.

APPLICATION DIRECTIONS

Application Timing

Apply to actively growing weeds. Extreme growing conditions such as drought or near freezing temperatures prior to, at or following application may reduce weed control and increase the risk of crop injury at all stages of growth. Only weeds that have emerged at the time of application will be affected. If foliage is wet at the time of application, control may be decreased. Applications of Clopyralid Acid + MCPA Ester are rainfast within 6 hours after application.

Application Rates

Generally, application rates at the lower end of the specified rate range will be satisfactory for young, succulent growth of susceptible weed species. For less sensitive species, perennials, and under conditions where control is more difficult (plant stress conditions such as drought or extreme temperatures, dense weed stands and/or larger weeds), the higher rates within the rate range will be needed. Weeds in fallow land or other areas where competition from crops is not present will generally require higher rates for control or suppression.

Use of Surfactants

Addition of wetting and/or penetration agents is not usually necessary when using Clopyralid Acid +

MCPA Ester; however, if a surfactant will be added to the spray solution, use a non-ionic surfactant suitable for use in growing crops of at least 80% active ingredient and do not exceed 4 pints per 100 gallons of spray solution (0.5% v/v). Use of a surfactant in the spray mixture may increase weed control effectiveness but may reduce crop safety, particularly under conditions of plant stress.

Spray Coverage

Use sufficient spray volume to provide thorough coverage and a uniform spray pattern. Do not broadcast apply in less than 2 gallons of total spray volume per acre. For best results and to minimize spray drift, apply in a spray volume of 10 gallons or more per acre. As vegetative canopy and weed density increase, spray volume should be increased to obtain equivalent weed control. Use only nozzle types and spray equipment designed for herbicide application. To reduce spray drift, follow precautions under Avoiding Injury to Non-target Plants.

Use with Sprayable Liquid Fertilizer Solutions

Clopyralid Acid + MCPA Ester is compatible with most non-pressurized liquid fertilizer solutions; however, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer, or pesticide is used, when the water source changes, or when tank mixture ingredients or concentrations are changed. A compatibility test is performed by mixing the spray components (in the desired order and proportions) into a clear glass jar before mixing in the spray tank. Use of a compatibility aid such as Unite or Compex may help obtain and maintain a uniform spray solution during mixing and application. Agitation in the spray tank must be vigorous to compare with jar test agitation. For best results, liquid fertilizer should not exceed 50% of the total spray volume. Premix Clopyralid Acid + MCPA Ester with water and add to the liquid fertilizer/water mixture while agitating contents of the spray tank. Apply the spray the same day it is prepared while maintaining continuous agitation.

Note: Foliar-applied liquid fertilizers can cause yellowing or leaf burn of crop foliage.

Spot Treatments

Spot treatments may be applied only with a calibrated boom or with hand sprayers according to directions provided below.

Hand-Held Sprayers: Hand-held sprayers may be used for spot applications. Care should be taken to apply the spray uniformly and at a rate equivalent to a broadcast application. Application rates in the table are based on an area of 1000 sq ft. Mix the amount of Clopyralid Acid + MCPA Ester (fl oz or ml) corresponding to the desired broadcast rate in 1 or more gallons of spray. To calculate the amount of Clopyralid Acid + MCPA Ester required for larger areas, multiply the table value (fl oz or ml) by the area to be treated in "thousands" of square feet, e.g., if the area to be treated is 3500 sq ft, multiply the table value by 3.5 (calc. 3500 / 1000 = 3.5). An area of 1000 sq ft is approximately 10.5 x 10.5 yards (strides) in size.

Amount of Clopyralid Acid + MCPA Ester per Gallon of Spray to Equal Specified Broadcast Rate						
1/3 pt/acre	1/2 pt/acre	3/4 pt/acre	1 pt/acre	2 pt/acre	3 pt/acre	4 pt/acre
1/8 fl oz (4 ml)	1/5 fl oz (6 ml)	1/4 fl oz (8 ml)	3/8 fl oz (11 ml)	3/4 fl oz (22 ml)	1 1/8 fl oz (33 ml)	1 1/2 fl oz (44 ml)

1 fl oz = 29.6 (30) ml

Note: For a rate such as 1 3/4 pint per acre, add together the values for 3/4 pint per acre and 1 pint per acre.

BROADLEAF WEEDS CONTROLLED

Note: The letter in parentheses (-) after the listed weed indicates if life cycle is annual (a), biennial (b), or perennial (p).

- alfalfa (from seed only) (p)
- artichoke, Jerusalem (p)
- buckwheat, wild (a)
- buffalobur (a)*
- burdock, common (b)
- chamomile, false (scentless) (a)
- chamomile, mayweed (dogfennel) (a)
- clover, black medic (a)
- clover, hop (a)
- clover, sweet (b)
- clover, red (p)
- clover, white (p)
- cocklebur, common (a)
- coffeeweed (a)
- cornflower (bachelor button) (a)
- dandelion (p)
- dock, curly (p)
- flixweed (a)*
- groundsel, common (b)
- hawksbeard, narrowleaf (a)
- hawkweed, orange (p)
- hawkweed, yellow (p)
- horseweed (a)
- jimsonweed (a)
- knapweed, diffuse (b)
- knapweed, Russian (p)*
- knapweed, spotted (b)
- kochia (2-4 leaf) (a)*
- ladysthumb (a)
- lambsquarters, common (a)
- lettuce, prickly (a)
- mustard, tumble (Jim Hill) (a)
- mustard, wild (a)
- nightshade, black (a)
- nightshade, cutleaf (a)
- nightshade, eastern black (a)
- nightshade, hairy (a)
- pennycress, field (fanweed) (a)
- pigweed, redroot (a)
- pineappleweed (a)
- plantain (p)
- radish, wild (a)
- ragweed, common (a)
- ragweed, giant (a)
- salsify, meadow (goatsbeard) (b)
- shepherdspurse (a)
- sicklepod (a)
- smartweed, Pennsylvania (a)
- sorrel, red (p)
- sowthistle, annual (a)
- sowthistle, perennial (p)*
- starthistle, yellow (a)
- sunflower, common (a)
- teasel, common (b)
- thistle, bull (b)
- tansymustard, pinnate (a)*
- thistle, Canada (p)
- thistle, musk (b)
- thistle, Russian (1-3-leaf) (a)*
- velvetleaf (a)
- vetch (a)
- volunteer beans (a)
- volunteer lentils (a)
- volunteer peas (a)
- wormwood, biennial (a)

*These weeds may only be suppressed. Suppression is a visual reduction in weed competition (reduced population or vigor) as compared to untreated areas. The degree and duration of weed control will vary with weed size and density, application rate and coverage, and growing conditions before, during and after treatment. For perennial weeds, Clopyralid Acid + MCPA Ester will control the initial top growth and inhibit regrowth during the season of application (season-long control). At the high end of the rate ranges listed, Clopyralid Acid + MCPA Ester may cause a reduction in shoot regrowth in the season following application; however, plant response may be inconsistent due to inherent variability in shoot regrowth from perennial root systems.

CROP USES

BARLEY, OATS AND WHEAT

Application Timing

Apply Clopyralid Acid + MCPA Ester in the spring to actively growing wheat, barley or oats once 3 leaves have unfolded on the main stem up to the jointing stage (first node of main stem detectable). To control or suppress listed weeds, make application after maximum emergence of the target weeds but before they exceed 3 inches in height or diameter (for rosettes). To obtain season-long control of perennial weeds, such as Canada thistle, apply after the majority of the weed's basal leaves have emerged from the soil up to bud stage. A later application when the crop is between the jointing and boot stages of growth may be used to treat later-emerging weeds; however, do not apply unless the risk of injury is acceptable. Do not apply after the boot stage. Note: Do not permit lactating dairy animals or meat animals being finished for slaughter to forage or graze treated grain fields within 1 week after treatment. Do not harvest hay from treated grain fields.

Application Rate

Apply 1 3/4 to 2 1/3 pints per acre of Clopyralid Acid + MCPA Ester. The higher rate may be used when the condition of the weeds and/or crop at the time of treatment may prevent optimum control.

Note: Higher rates of Clopyralid Acid + MCPA Ester or any application of Clopyralid Acid + MCPA Ester following a spring postemergence treatment with 2,4-D or MCPA may increase the risk of crop injury.

Do not apply more than 2 1/3 pints (0.75 lb MCPA acid equivalent) per acre per year

Tank Mixtures

Clopyralid Acid + MCPA Ester may be applied in tank mix combination with labeled rates of other products registered for postemergence application in wheat, barley, and oats. See Tank Mixing Precautions under Mixing Instructions. When tank mixing, do not exceed specified application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

Specific Use Precautions:

- Banvel tank mixes with Clopyralid Acid + MCPA Ester may be useful in broadening the annual weed control spectrum but may reduce control of perennials, such as Canada thistle.
- Do not tank mix Clopyralid Acid + MCPA Ester with 2,4-D or dicamba unless the risk of crop injury is acceptable.
- If tank mixed with other products containing MCPA do not exceed 0.75 lbs MCPA acid equivalent per acre per year.

FLAX

Application Timing

Apply Clopyralid Acid + MCPA Ester when flax is 2 to 6 inches tall and target weeds are actively growing. To control or suppress weeds listed on the label, make application after maximum emergence of the target weeds but before they exceed 3 inches in height or diameter (for rosettes). To obtain season-long control of perennial weeds such as Canada thistle, apply after the majority of the weed's basal leaves have emerged from the soil (plants 4 to 6 inches in height) up to bud stage. Do not apply after flax has begun bolting as crop injury may occur if applied during the bloom period.

Application Rate

Apply 0.5 to 0.85 pints per acre of Clopyralid Acid + MCPA Ester. The higher rate may be used when the condition of the weeds and/or crop at the time of treatment may prevent optimum control.

Tank Mixtures

Clopyralid Acid + MCPA Ester may be used in combination with other herbicides that are labeled for flax. Refer to the label of the tank mix partner for lists of other weeds controlled, rates of application and use precautions.

Specific Use Restrictions:

- Do not apply more than 0.85 pints (0.25 lb MCPA acid equivalent) per acre per year or make more than 1 application per crop season.
- Preharvest Interval: Do not apply within 72 days of harvest.
- If tank mixed with other products containing MCPA do not exceed 0.25 lbs MCPA acid equivalent per acre per year.

GRASSES GROWN FOR SEED

Application Timing

Apply only to established grasses before the boot stage of growth. Applications in the boot stage and beyond will result in increased potential for injury. Do not apply to bentgrass unless injury can be tolerated. For control of late-emerging Canada thistle, a preharvest treatment may be made after grass seed is fully developed. Treatment of Canada thistle in the bud stage and later may result in less consistent control. Post-harvest fall treatments may be made to actively growing Canada thistle after the majority of basal leaves have emerged.

Application Rate

Use 1 3/4 to 3 1/2 pints per acre of Clopyralid Acid + MCPA Ester for control of annual weeds and Canada thistle. The potential for crop injury exists due to the MCPA component of this product and must be balanced against the benefits of improved weed control. Potential for crop injury increases with higher rates.

Retreat application if necessary but do not exceed 3 1/2 pints per acre of Clopyralid Acid + MCPA Ester per year.

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

Tank Mixtures for Grasses Grown for Seed

Clopyralid Acid + MCPA Ester at 1 3/4 pints per acre may be tank mixed with Banvel or Buctril to improve the control of certain weeds. See Tank Mixing Precautions under Mixing Instructions. When tank mixing, do not exceed specified application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

RANGELAND AND PASTURE USES

Rotation to Broadleaf Crops: Do not plant broadleaf crops in treated areas until an adequately sensitive bioassay shows that no detectable clopyralid is present in the soil (see field bioassay instructions).

RANGELAND AND PERMANENT GRASS PASTURES

Apply 3 to 5 pints per acre of Clopyralid Acid + MCPA Ester when weeds are actively growing. For weeds such as biennial thistles, spotted and diffuse knapweed, yellow starthistle and Canada thistle, apply the 5 pints per acre rate on light to moderate infestations under good growing conditions. For control of Russian knapweed, apply 5 pints per acre at the early bud to mid-flowering stage or on fall regrowth. Note: For pasture use follow Grazing and Haying Restrictions under General Use Precautions and Restrictions.

- Do not apply more than 5 pints (1.5 lb MCPA acid equivalent) per acre per year
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- If tank mixed with other products containing MCPA do not exceed 1.5 lbs MCPA acid equivalent per acre per year.

CONSERVATION RESERVE PROGRAM (CRP) FOR SEEDING TO PERMANENT GRASSES ONLY

Do not use Clopyralid Acid + MCPA Ester if legumes or bentgrass are a desired cover during CRP.

Application Timing

Clopyralid Acid + MCPA Ester can be applied when perennial grasses are well established as indicated by vigorous growth and development of tillers and secondary roots. For control of weeds such as musk thistle, Canada thistle and knapweed (diffuse, spotted and Russian), apply to actively growing weeds after the majority of the basal leaves have emerged up to bud stage. Later applications may result in less consistent control.

In fields with heavy weed density that are to be planted to CRP grasses, a pre-seeding application may be made. In general, cropland to be planted to CRP in the spring should be treated during the previous fall and cropland to be planted to CRP in the fall should be treated during the previous spring or summer. A pre-seeding treatment with Clopyralid Acid + MCPA Ester may cause visible injury and reduced seed production in some newly planted grass stands; however, grass stand establishment should be improved because of reduced weed competition. Wait at least 30 days after a treating with Clopyralid Acid + MCPA Ester before seeding grasses.

After CRP, do not plant broadleaf crops in treated areas until an adequately sensitive bioassay shows that no detectable clopyralid is present in the soil.

Application Rate

Apply 3 ½ to 5 pints per acre of Clopyralid Acid + MCPA Ester.

- Do not exceed 3 ½ pints per acre for pre-seeding treatment.
- Do not apply more than 5 pints (1.5 lb MCPA acid equivalent) per acre per year.
- If tank mixed with other products containing MCPA do not exceed 1.5 lbs MCPA acid equivalent per acre per year.

TERMS AND CONDITIONS OF USE

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

WARRANTY DISCLAIMER

Albaugh, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent consistent with applicable law, Albaugh, Inc. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

INHERENT RISKS OF USE

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Albaugh, Inc. or the seller. To the extent consistent with applicable law, all such risks shall be assumed by buyer.

LIMITATION OF REMEDIES

To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Albaugh, Inc.' election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used

To the extent consistent with applicable law, Albaugh, Inc. shall not be liable for losses or damages resulting from handling or use of this product unless Albaugh, Inc. is promptly notified of such loss or damage in writing. In no case shall Albaugh, Inc. be liable for consequential or incidental damages or losses.

The terms of the Warranty Disclaimer, Inherent Risks of Use, and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Albaugh, Inc. or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.