

42750-127

3/23/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAR 23 2007

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

Re: Notification of Alternate Brand Name: Triclopyr 44% TEA IVM
EPA Reg. No.: 42750-127
Date of Submission: February 13, 2007

Dear Mr. Gaskins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 13, 2007, for the product Triclopyr 3A. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" but not reviewed and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington", is located below the word "Sincerely,".

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



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 42750-127	2. EPA Product Manager J. Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Triclopyr 44% TEA IVM	PM# 25	
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 _____	

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 alternate brand name: TRICLOPYR 3A

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

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 <input type="checkbox"/> Other (Specify) _____	
* 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 gl, bulk		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> 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) 229-244-3283
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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	6. Date Application Received (Stamped)
4. Typed Name Morris Gaskins	5. Date February 13, 2007	

CORPORATE OFFICE
1525 NE 36th Street
Ankeny, IA 50021
515.964.9444 (Phone)
800.247.8013 (Toll Free)
515.964.7813 (FAX)

ALBAUGH, INC.

3/18
ALBAUGH, INC. — VALDOSTA
304 Janet Street, Suite H
Valdosta, Georgia 31602
229.244.3288 (Direct Dial)
229.244.5841 (FAX)

FEDERAL EXPRESS

February 13, 2006

Mr. Jim Tompkins (PM 25)
Document Processing Desk (DIST)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
2777 South Crystal Dr.
Arlington, VA 22202

RE: Triclopyr BEE + 2,4-D BEE
EPA File Symbol 42750-124

Triclopyr 61% BEE IVM
EPA File Symbol 42750-126

Triclopyr 44% TEA Rice
EPA File Symbol 42750-128

Triclopyr TEA + Clopyralid TEA R&P
EPA File Symbol 42750-125

Triclopyr 44% TEA IVM
EPA File Symbol 42750-127

Triclopyr 61% BEE R&P
EPA File Symbol 42750-129

Dear Mr. Tompkins,

The enclosed submission is a notification for the above referenced registration under PR Notice 98-10 of the alternate brand name:

CROSSROAD
(42750-124)

REFUTE
(42750-125)

TRICLOPYR 4E
(42750-126)

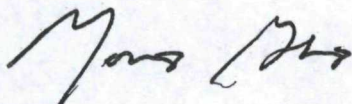
TRICLOPYR 3A
(42750-127)

TRICLOPYR RICE
(42750-128)

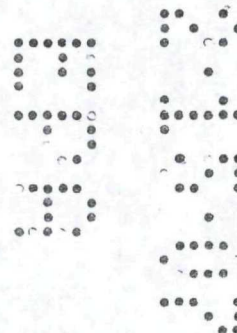
TRICLOPYR R&P
(42750-129)

Please call if you have any questions.

Regards,



Morris Gaskins
Registrations Manager
Albaugh, Inc.
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS
www.albaughinc.com

MAR 23 2007

TRICLOPYR 3A

For the control of woody plants, broadleaf weeds and vines in forests and industrial non-crop areas, including manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, fence rows, non-irrigation ditch banks, and around farm buildings; including application to grazed areas, and establishment and maintenance of wildlife openings on these sites, and in Christmas tree plantations. Use within production forests and industrial non-crop sites may include applications to control target vegetation in and around standing water sites, such as marshes, wetlands, and the banks of ponds and lakes.

ACTIVE INGREDIENT:

Triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, triethylamine salt 44.4%

INERT INGREDIENTS: 55.6%

TOTAL: 100.0%

Acid equivalent: triclopyr - 31.8%-3 lb/gal

KEEP OUT OF REACH OF CHILDREN

DANGER

PELIGRO

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

FIRST AID

IF IN EYES: Hold eyelids open and flush 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: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 minutes. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

NOTE TO APPLICATOR: Allergic skin reaction is not expected from exposure to spray mixtures of TRICLOPYR 3A herbicide when used as directed.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 42750-127
AD 040606

EPA Est. No. xxxxxx-xx-xxx

NET CONTENTS:

Manufactured By:
ALBAUGH, INC.
ANKENY, IA 50021

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER! Corrosive. Causes Irreversible Eye Damage. Harmful If Swallowed or absorbed through skin. Prolonged or frequently repeated skin contact with herbicide concentrate may cause an allergic skin reaction in some individuals. Do not get in eyes or on skin or clothing.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

1. Long-sleeved shirt and long pants
2. Shoes plus socks
3. Protective eyewear
4. Chemical resistant gloves (> 14 mils) such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber.

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, 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 WPS (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

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

Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Under certain conditions, treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants, which may contribute to fish suffocation. This loss can cause fish suffocation. Therefore, to minimize this hazard, do not treat more than one-third to one-half of the water area in a single operation and wait at least 10 to 14 days between treatments. Begin treatment along the shore and proceed outwards in bands to allow fish to move into untreated areas. Consult with the State agency for fish and game before applying to public water to determine if a permit is needed. This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

PHYSICAL OR CHEMICAL HAZARDS

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

Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

DIRECTIONS FOR USE

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

Read all Directions for Use carefully before applying.

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.

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
- Shoes plus socks
- Protective eyewear
- Chemical resistant gloves (> 14 mils) such as butyl rubber, natural rubber, neoprene rubber or nitrile rubber.

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: For applications to non-cropland areas, do not allow entry into areas until sprays have dried, unless applicator and other handler PPE is worn.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

PESTICIDE STORAGE: Store above 28°F or agitate before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide spray mixture, or rinsate, is a violation of federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL (Metal): 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.

CONTAINER DISPOSAL (Plastic): 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.

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

GENERAL INFORMATION FOR PRODUCTION FORESTS AND INDUSTRIAL NON-CROP AREAS

TRICLOPYR 3A can be used to control woody plants, broadleaf weeds and vines in forests and industrial non-crop areas including manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, fence rows, non-irrigation ditch banks, and around farm buildings, including application to grazed areas, and establishment and maintenance of wildlife openings on these sites, and in Christmas tree plantations. Use within production forests and industrial non-crop sites may include applications to control target vegetation in and around standing water sites, such as marshes, wetlands, and the banks of ponds and lakes.

Obtain Required Permits: Consult with appropriate state or local water authorities before applying this product to public waters. State or local public agencies may require permits.

GENERAL USE PRECAUTIONS AND RESTRICTIONS

In Arizona: The state of Arizona has not approved TRICLOPYR 3A for use on plants grown for commercial production, specifically forests grown for commercial timber production, or on designated grazing areas.

When applying this product in tank mix combination, follow all applicable use directions, precautions and limitations on each manufacturer's label.

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

Do not apply TRICLOPYR 3A directly to, or allow direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants, and do not permit spray mists containing it to drift into them.

It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands (such as flood plains, deltas, marshes, swamps, or bogs) and transitional areas between upland and lowland sites.

- Do not apply to salt water bays or estuaries.
- Do not apply directly to un-impounded rivers or streams.
- Do not apply on ditches or canals used to transport irrigation water. It is permissible to treat non-irrigation ditch banks.
- Do not apply where runoff water may flow onto agricultural land as injury to crops may result.
- When making applications to control unwanted plants on banks or shorelines of moving water sites, minimize overspray to open water.
- The use of a mistblower is not recommended.
- Apply no more than 2 lb ae of triclopyr (2/3 gallon of TRICLOPYR 3A) per acre per growing season on range and pasture sites, including rights-of-way, fence rows or any area where grazing or harvesting is allowed.
- On forestry sites, TRICLOPYR 3A may be used at rates up to 6 lb ae of triclopyr (2 gallons of TRICLOPYR 3A) per acre per year.
- For all terrestrial use sites other than range, pasture, forestry sites, and grazed areas, the maximum application rate is 9 lb ae of triclopyr (3 gallons of TRICLOPYR 3A) per acre per year.

Precautions for Potable Water Intakes for Emerged Aquatic Weed Control

Refer to the chart below for specific setback distances near functioning potable water intakes.

NOTE: Existing potable water intakes which are no longer in use, such as those replaced by potable water wells or connections to a municipal water system, are not considered to be functioning potable water intakes. These setback restrictions do not apply to terrestrial applications made adjacent to potable water intakes.

Area Treated (acres)	TRICLOPYR 3A Application Rate, qt/acre			
	2 qt/acre	4 qt/acre	6 qt/acre	8 qt/acre
	Setback Distance (ft)			
4	0	200	400	500
>4 - 8	0	200	700	900
>8 - 16	0	200	700	1000
>16	0	200	900	1300

When applying TRICLOPYR 3A around and within the distances noted in the table above from a functioning potable water intake, the intake must be turned off until the triclopyr level in the intake water is determined to be 0.4 parts per million (ppm) or less by laboratory analysis or immunoassay.

Recreational Use of Water in Treatment Area: There are no restrictions on use of water in the treatment area for recreational purposes, including swimming and fishing.

Livestock Use of Water from Treatment Area: There are no restrictions on livestock consumption of water from the treatment area.

Grazing and Haying Restrictions

Except for lactating dairy animals, there are no grazing restrictions following application of this product.

Grazing Lactating Dairy Animals: Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.

Do not harvest hay for 14 days after application.

Grazed areas of non-cropland and forestry sites may be spot treated if they comprise no more than 10% of the total grazable area.

Slaughter Restrictions: During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

Avoiding Injurious Spray Drift

Applications should be made only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants. Do not spray when wind is blowing toward susceptible crops or ornamental plants near enough to be injured. It is suggested that a continuous smoke column at or near the spray site or a smoke generator on the spray equipment be used to detect air movement, lapse conditions, or temperature inversions (stable air). If the smoke layers or indicates a potential of hazardous spray drift, do not spray

Aerial Application: For aerial application on rights-of-way or other areas near susceptible crops, apply through a Microfoil+ or Thru-Valve boom+, or use an agriculturally labeled drift control additive. Other drift reducing systems or thickened sprays prepared by using high viscosity inverting systems may be used if they are made as drift-free as mixtures containing agriculturally labeled thickening agents or applications made with the Microfoil or Thru-Valve boom. Keep spray pressures low enough to provide coarse spray

droplets. Spray boom should be no longer than 3/4 of the rotor length. Do not use a thickening agent with the Microfoil or Thru-Valve booms, or other systems that cannot accommodate thick sprays. Spray only when the wind velocity is low (follow state regulations). Avoid application during air inversions. If a spray thickening agent is used, follow all use recommendations and precautions on the product label.

+ Any reference to specific application equipment is made without consideration by the applicator and is subject to applicator's own opinion and experience. Any reference is not intended to endorse referenced equipment, nor constitute a warranty of such equipment, which is the sole responsibility of the equipment manufacturer. Other equipment may be available and equally suitable.

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.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications:

1. The distance of the outer most operating nozzles on the boom must not exceed 3/4 the length of the rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the following Aerial Drift Reduction Advisory. [This information is advisory in nature and does not supersede mandatory label requirements.]

Aerial Drift Reduction Advisory

Information on Droplet Size: 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).

Controlling Droplet Size:

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

Application Height: Applications should 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: 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: 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 should be avoided below 2 mph due to variable wind direction and high inversion potential. Note: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity: When making applications 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: Applications should not occur during a local, low level 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 the 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.

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 habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Ground Equipment: To aid in reducing spray drift, TRICLOPYR 3A should be used in thickened (high viscosity) spray mixtures using an agriculturally labeled drift control additive, high viscosity invert system, or equivalent as directed by the manufacturer. With ground equipment, spray drift can be reduced by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); and by spraying when wind velocity is low (follow state regulations). In hand-gun applications, select the minimum spray pressure that will provide adequate plant coverage (without forming a mist). Do not apply with nozzles that produce a fine-droplet spray.

High Volume Leaf-Stem Treatment: To minimize spray drift, do not use pressure exceeding 50 psi at the spray nozzle and keep sprays no higher than brush tops. An agriculturally labeled thickening agent may be used to reduce drift.

Plants Controlled by TRICLOPYR 3A

Woody Plant Species

alder	bear clover (bearmat)	blackgum
arrowwood	beech	Brazilian pepper
ash	birch	cascara
aspen	blackberry	ceanothus

cherry	locust	sumac
chinquapin	madrone	sweetbay magnolia
choke cherry	maples	sweetgum
cottonwood	mulberry	sycamore
crataegus (hawthorn)	oaks	tanoak
Douglas-fir	persimmon	thimbleberry
dogwood	pine	tulip poplar
elderberry	poison ivy	waxmyrtle
elm	poison oak	western hemlock
gallberry	poplar	wild rose
hazel	salt-bush (Baccharis spp.)	winged elm
hornbean	sassafras	salmonberry
kudzu+	scotch broom	

+For complete control, retreatment may be necessary.

Annual and Perennial Broadleaf Weeds

bindweed	dandelion	ragweed
burdock	field bindweed	smartweed
Canada thistle	lambquarter	tansy ragwort
chicory	plantain	vetch
curly dock	Purple loosestrife	wild lettuce

APPLICATION METHODS

Apply TRICLOPYR 3A at 1 to 12 quarts per acre (equivalent to 3/4 to 9 lb triclopyr acid) to control the broadleaf weeds and woody plants listed above. Always apply in sufficient water to insure uniform and complete coverage of the foliage of the plants to be controlled. Tank mixing with a suitable non-ionic surfactant will increase coverage. Follow the use directions and precautions on the surfactant label. Use the higher recommended concentrations of surfactant in the spray mixture when applying lower spray volumes per acre.

Optimal order of addition to the spray tank is:

1. Water
2. Thickening agent (if used)
3. Additional herbicide (if used)
4. TRICLOPYR 3A
5. Surfactant (if used)

Continuous and adequate agitation is required.

Before using any recommended tank mixtures, read the directions and all use precautions on both labels.

Optimal control is achieved when woody plants and weeds are actively growing. On difficult to control species such as ash, blackgum, choke cherry, elm, maples, oaks, pines, or winged elm or when applying in late summer when the plants are mature and during drought conditions, use the higher label rates.

When using TRICLOPYR 3A in combination with 2,4-D 3.8 lb amine, like DMA 4 IVM, or low volatile ester herbicides, generally the higher rates should be used for satisfactory brush control.

Apply higher rates when target brush is tall (approximately 10 - 15 feet in height) or when the brush foliage exceeds 60% of the area to be treated. Application of lower rates may cause resprouting the

following year.

For easy to control brush species or reduced foliage, lower rates may be effective. Consult State or Local Extension personnel for such information.

FOLIAGE TREATMENT WITH GROUND EQUIPMENT

High Volume Foliage Treatment

For woody plants, apply TRICLOPYR 3A at 4 to 12 quarts per 100 gallons of water (equivalent to 3 to 9 lb triclopyr acid). Alternately apply TRICLOPYR 3A at 1 to 4 quarts (equivalent to ¾ to 3 lb triclopyr acid) in combination with 1 to 2 quarts of a 2,4-D 3.8 lb amine product, (like DMA 4 IVM) or Tordon 101 mixture and diluted to make 100 gallons of spray solution. Apply at a volume of 100 to 400 gallons of total spray per acre depending on foliage density of woody plants. Coverage should be made to thoroughly wet all foliage and root collars but not to create runoff.

(See General Use Precautions and Restrictions.)

Do not exceed maximum allowable use rates per acre (see table below).

Maximum Labeled Rate versus Spray Volume per Acre

Total Spray Volume (gal/acre)	Maximum Rate of TRICLOPYR 3A		
	Rangeland and Pasture Sites(1) (gal/100 gal of spray)	Forestry Sites(2) (gal/100 gal of spray)	Other Non-Cropland Sites(3) (gal/100 gal of spray)
400	Do not use	0.5	0.75
300	Do not use	0.67	1
200	Do not use	1	1.5
100	0.67	2	3
50	1.33	4	6
40	1.67	5	7.5
30	2.33	6.65	10
20	3.33	10	15
10	6.67	20	30

(1) Do not exceed the maximum use rate of 2 lb ae of triclopyr (2/3 gal of TRICLOPYR 3A)/acre/year.

(2) Do not exceed the maximum use rate of 6 lb ae of triclopyr (2 gal of TRICLOPYR 3A)/acre/year.

(3) Do not exceed the maximum use rate of 9 lb ae of triclopyr (3 gal of TRICLOPYR 3A)/acre/year on non-cropland use sites other than rangeland, pasture, forestry, and grazed areas.

Low Volume Foliage Treatment

To control susceptible woody plants, apply up to 20 quarts of TRICLOPYR 3A in 10 to 100 gallons of finished spray. The spray concentration of TRICLOPYR 3A and total spray volume per acre should be adjusted depending on the size and foliage density of target woody plants and type of spray equipment used. Regardless of spray volume uniform coverage of target plant foliage (including stems and root collars) is essential for optimal control (see General Use Precautions and Restrictions). When making low volume applications a surfactant is recommended. Delivery rate of spray nozzles to height and density of woody plants is important. When treating tall, dense brush, a spray gun that can deliver up to 2 gallons per minute at 40 to 60 psi may be required. Application equipment with spray tips that deliver less than 1 gallon of spray per minute (such as backpack sprayers) may only be appropriate for short, low to moderate density brush.

Tank Mixing: As a low volume foliar spray, up to 12 quarts TRICLOPYR 3A (equivalent to 9 lb triclopyr

acid) may be applied in a tank mix combination with 2 to 4 quarts Tordon K or 4 to 8 quarts of Tordon 101 Mixture in 10 to 100 gallons of finished spray.

BROADCAST APPLICATIONS WITH GROUND EQUIPMENT

Use only equipment that will assure uniform coverage of the spray volumes applied. The addition of a non-ionic surfactant may enhance coverage. See Maximum Labeled Rate versus Spray Volume per Acre table above for relationship between mixing rate, spray volume and maximum application rate.

Woody Plant Control

Foliage Treatment: Use 8 to 12 quarts of TRICLOPYR 3A (equivalent to 6 to 9 lb triclopyr acid) in enough water to make 20 to 100 gallons of total spray per acre. 2 to 4 quarts of TRICLOPYR 3A may be tank mixed with 4 to 8 quarts of 2,4-D 3.8 lb amine, (like DMA 4 IVM) or Tordon 101 Mixture in sufficient water to make 20 to 100 gallons of total spray per acre.

Broadleaf Weed Control

Apply 1 1/3 to 6 quarts of TRICLOPYR 3A (equivalent to 1 to 4 1/2 lb triclopyr acid) in a total volume of 20 to 100 gallons of water per acre. Application may be made at any time during the growing season. TRICLOPYR 3A at 1 1/3 to 4 quarts may be tank mixed with 2 to 4 quarts of Tordon K, Tordon 101 Mixture or 2,4-D 3.8 lb amine, like DMA 4 IVM herbicides to improve the weed spectrum.

Aerial Application (Helicopter Only)

Aerial sprays should be applied using suitable drift control. (See General Use Precautions and Restrictions) Add an agriculturally labeled non-ionic surfactant as described under Directions for Use. See Maximum Labeled Rate versus Spray Volume per Acre table above for relationship between mixing rate, spray volume and maximum application rate.

Foliage Treatment (Non-Grazed Rights-of-Way)

Non-grazed areas: Apply 4 to 12 quarts of TRICLOPYR 3A (equivalent to 6 to 9 lb of triclopyr acid) or 4 to 6 quarts of TRICLOPYR 3A in a tank mix combination with 4 to 8 quartss of 2,4-D 3.8 lb amine, like DMA 4 IVM, or or Tordon 101 Mixture, and apply in a total spray volume of 10 to 30 gallons per acre. Apply higher rates and volumes if target plants are dense or under drought conditions.

Areas within non-grazed rights-of-ways that may be grazed may be spot treated if the treated area comprises no more than 10% of the total grazable area.

FOREST MANAGEMENT APPLICATIONS

Optimal control for broadcast applications of TRICLOPYR 3A is achieved using spray volumes that allow thorough plant coverage. Recommended spray volumes are usually 10 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground depending upon equipment. When using spray volumes less than 50 gallons per acre, the addition of an agriculturally labeled non-ionic surfactant as described under Directions for Use will help assure more complete coverage of foliage. Application systems or additives designed to minimize drift by producing larger droplets may require higher spray volumes to maintain brush control.

Forest Site Preparation (Not for Conifer Release)

Apply up to 8 quarts of TRICLOPYR 3A (equivalent to 6 lb triclopyr acid) and apply in a total spray volume of 10 to 30 gallons per acre. 4 to 6 quarts of TRICLOPYR 3A (equivalent to 3 to 4 1/2 lb triclopyr

acid) may be tank mixed with 1 to 2 gallons of Tordon 101 Mixture or 2,4-D 3.8 lb low volatile ester in a tank mix combination in a total spray volume of 10 to 30 gallons per acre. Use of a non-ionic agricultural surfactant is recommended for all foliar applications as described under Directions for Use.

Note: Conifers planted within one month after treatment with TRICLOPYR 3A at less than 5 1/3 quarts per acre or sooner than two months after treatment at 5 1/3 to 12 quarts per acre may be injured due to residual triclopyr in soil. If applying tank mixtures with other herbicides for forest site preparation, review labels for all products in the mixture to determine the longest recommended waiting period before re-planting treated site.

Directed Spray Applications for Conifer Release

To release conifers from competing hardwoods such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, hickory, alder, birch, aspen, and pin cherry, mix 4 to 8 quarts of TRICLOPYR 3A (equivalent to 3 to 6 lb triclopyr acid) in enough water to make 100 gallons of spray mixture. Spray coverage may be improved by the addition of a non-ionic surfactant as described under Directions for Use. Direct the spray onto the foliage of competing hardwoods using a knapsack or backpack sprayer with flat fan nozzles. Make application any time after hardwoods have reached full leaf size, but prior to autumn coloration. Treated hardwoods should be less than 6 feet in height to ensure adequate spray coverage. Avoid with conifer foliage, particularly desirable pines.

Note: Spray may cause temporary damage and growth suppression where contact with conifers occurs; however, injured conifers should recover and grow normally. Over-the-top broadcast type spray applications can kill pines.

Broadcast Application for Conifer Release in the Northeastern United States

To release spruce, fir, red pine and white pine from competing hardwoods, such as red maple, sugar maple, striped maple, alder, birch (white, yellow or gray), aspen, ash, pin cherry and *Rubus* spp. and perennial and annual broadleaf weeds, apply 2 to 4 quarts of TRICLOPYR 3A (equivalent to 1 1/2 to 3 lb triclopyr acid) per acre alone or with 2,4-D amine, like DMA 4 IVM, or 2,4-D ester to provide no more than 4 pounds acid equivalent per acre from both products. Make applications in late summer or early fall after conifers have formed their over wintering buds and hardwoods are in full leaf and prior to autumn coloration.

Broadcast Applications for Douglas Fir Release in the Pacific Northwest and California

To release Douglas fir from susceptible competing vegetation such as broadleaf weeds, alder, blackberry or Scotch broom, apply 1 1/3 to 2 quarts of TRICLOPYR 3A (equivalent to 1 to 1 1/2 lb triclopyr acid) per acre alone or in combination with 4 lb per acre of atrazine. Mix all sprays in a water carrier with a non-ionic surfactant. Make applications in early spring after hardwoods begin growth and before Douglas fir bud break ("early foliar" hardwood stage) or after Douglas fir seasonal growth has "hardened off" (set winter buds) in late summer, but while hardwoods are still actively growing. When treating after Douglas fir bud set, apply prior to onset of autumn coloration in hardwood foliage.

Note: Applications made during active Douglas fir shoot growth (after spring bud break and prior to bud set) may cause injury to Douglas fir trees.

CUT SURFACE TREATMENTS

To control unwanted trees of hardwood species such as elm, maple, oak and conifers in rights-of-way and other non-crop areas, make a 50% (1 to 1 ratio with water) to 100% (undiluted) application of TRICLOPYR 3A as directed below.

Tree Injector Method

Using suitable equipment, inject 1/2 milliliter of undiluted TRICLOPYR 3A or 1 milliliter of the diluted solution into the bark at intervals of 3 to 4 inches between centers of the injector wound. The injections should completely surround the tree at any convenient height.

Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is injected directly into plants.

Hack and Squirt Method

Make cuts with a suitable tool at intervals of 3 to 4 inches between centers at a convenient height around the tree trunk. Apply 1/2 milliliter of undiluted TRICLOPYR 3A or 1 milliliter of the diluted solution into each cut.

Frill or Girdle Method

Make a single girdle through the bark completely around the tree at a convenient height. Wet the cut surface with undiluted or diluted solution.

Note: Both the Hack and Squirt method and the Frill or Girdle method may not be effective during heavy sap flow of certain species such as maples.

Stump Treatment

Spray or paint the cut surfaces of freshly cut stumps and stubs with undiluted TRICLOPYR 3A. Make sure the cambium area next to the bark is wet.

CHRISTMAS TREE PLANTATIONS

Use TRICLOPYR 3A to control woody plants and annual and perennial broadleaf weeds in established Christmas tree plantations. Best results are obtained when woody plants and weeds are actively growing. TRICLOPYR 3A will not control weeds that have not emerged at the time of application. Resprouting can occur the year after treatment when lower rates are made on hard to control species. Applications made with backpack or knapsack sprayers to plants over 8 feet in height may result in reduced control due to inability to reach top foliage. Applicators should use the higher rates of TRICLOPYR 3A or use cut surface application methods when treating large brush or trees or hard to control species (such as ash, blackgum, choke cherry, elm, hazel, madrone, maples, oaks or sweetgum), and for applications made during drought conditions or in late summer when the leaves are mature. When making foliar applications, use enough water to give thorough coverage. Reduced control may occur when applications are made under drought conditions.

Use Precautions

- Do not use on newly seeded grass until well established as indicated by vigorous growth and development of secondary root system and tillering
- Newly seeded turf (alleyways, etc.) should be mowed two or three times before any treatment with TRICLOPYR 3A.
- Do not reseed Christmas tree areas treated with TRICLOPYR 3A for a minimum of three weeks after application.
- Do not use TRICLOPYR 3A if legumes, such as clover, are present and injury cannot be tolerated.

Spray Preparation

Optimal order of addition to the spray tank is:

1. Water
2. Drift control agent (if used)
3. Non-ionic agricultural surfactant (if used)

4. TRICLOPYR 3A.

Use moderate agitation while mixing and spraying. Use of a non-ionic agricultural surfactant is recommended for all applications. Follow use directions and precautions listed on the manufacturer's label. Use the higher recommended concentrations of surfactant in the spray mixture when applying lower spray volumes per acre.

Application

Time applications for late summer or early autumn after terminal growth of Christmas trees has hardened off, but prior weed leaf drop. Apply 2 to 5 pints of TRICLOPYR 3A (equivalent to $\frac{3}{4}$ to 1 $\frac{3}{4}$ lb triclopyr acid) per acre as directed spray toward the base of Christmas trees. Use enough spray volume to provide thorough coverage of target plants (20 to 100 gallons per acre).

Do not apply with 2,4-D.

Application rates of TRICLOPYR 3A recommended for Christmas trees will only suppress some well established woody plants that are greater than 2 to 3 years old (see table below). Broadcast sprays may also be applied in bands between the rows of planted trees. Use spray equipment that will assure uniform coverage of the desired spray volume.

Unintended foliage contact of TRICLOPYR 3A to Christmas trees from directed sprays can cause needle and branch injury. Blue spruce, white spruce, balsam fir and Fraser fir are less susceptible to injury than white pine and Douglas fir.

Restriction: Apply TRICLOPYR 3A only to established Christmas trees that were planted at least one full year prior to application.

Application Rates and Species Controlled:

SPECIES	APPLICATION RATE (pint/Acre)	COMMENT
clover, dandelion, dock curly, lambsquarters, lespedeza, plantain (broadleaf), plantain (buckhorn), ragweed, common vetch	2	
Blackberry	4	
Chicory (suppression), fireweed, ivy (ground), lettuce (wild), oxalis, poison ivy, violet (wild), Virginia creeper	3 to 4	
bindweed (field), smartweed, thistle (Canada)		Top growth control, retreatment may be necessary
Aspen, chinquapin, elderberry, Grape (wild)	5	
Arrowwood, beech, birch, cottonwood, mulberry, poplar, sassafras, sumac, sycamore		Seedlings less than 2-3 years old

Directed Applications

To control hardwoods such as red maple, sugar maple, striped maple, sweetgum, red and white oaks, ash, alder, birch, aspen, and pin cherry mix 4 to 20 fluid ounces of TRICLOPYR 3A in enough water to make 3 gallons of spray mixture. For directed applications, do not exceed 8 quarts of TRICLOPYR 3A (equivalent to 6 lb triclopyr acid) per acre per year. Spray coverage may be improved by the addition of a non-ionic surfactant as described under Directions for Use. Direct the spray onto the foliage of competing

hardwoods using a knapsack or backpack sprayer with flat fan nozzles. Make application any time after hardwoods have reached full leaf size, but prior to autumn coloration. Treated hardwoods should be less than 8 feet in height to ensure adequate spray coverage.

Note: To prevent Christmas tree injury, care should be taken to direct spray away from contact with Christmas tree foliage.

Cut Surface Treatments

When treating large brush or trees or hard to control species such as ash, blackgum, choke cherry, elm, hazel, madrone, maples, oaks or sweetgum, and for applications made during drought conditions or in late summer when the leaves are mature, use cut surface treatments. (See directions for Cut Surface Treatments in preceding section of this label.)

WETLAND SITES IN PRODUCTION FORESTS AND INDUSTRIAL NON-CROP AREAS

TRICLOPYR 3A may be used within production forests and industrial non-crop sites to control target vegetation in and around standing water sites, such as marshes, wetlands, and the banks of ponds and lakes and transition areas between upland and lowland sites.

For control of woody plants and broadleaf weeds in these sites, follow use directions and application methods on this label for forestry and terrestrial non-cropland sites.

Use Precautions

Minimize overspray to open water when treating target vegetation in and around non-flowing, quiescent or transient water. When making applications to control unwanted plants on banks or shorelines of flowing water, minimize overspray to open water.

Note: Consult local public water control authorities before applying this product in and around public water. Permits may be required to treat such areas.

WARRANTY DISCLAIMER

Albaugh 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. Albaugh 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 or the seller. All such risks shall be assumed by buyer.

Limitation of Remedies

To the extent permitted by 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's 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 permitted by law, Albaugh shall not be liable for losses or damages resulting from handling or use of

this product unless Albaugh is promptly notified of such loss or damage in writing. To the extent permitted by law in no case shall Albaugh be liable for consequential or incidental damages or losses.

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