Rhonda L. Hotop Sandoz Crop Protection Corporation 1300 East Touhy Avenue Des Plaines, IL 60018

Dear Ms. Hotop:

Subject: Revised Label and Confidential Statement of Formula

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUL 02 1995.

Banvel 520 Herbicide

EPA Registration No. 55947-19

Your Submission Dated May 22, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Due to new EPA policy, part of the Environmental Hazards section has been changed. To comply, change the sentence "Do not apply to water or wetlands (swamps, bogs, or marshes) " to read "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."
- 2) Under the Application section, the directions refer to the "Grazing and Harvesting Restrictions and Sensitive Crop Precautions" for precautions regarding spray drift. However, the Grazing and Harvesting Restrictions do not pertain to any spray drift precautions. Therefore, the sentence should be rewritten to read "Refer to the Sensitive Crop Precautions section for drift precautionary statements."

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above changes.

The Confidential Statement of Formula dated May 13, 1991 is acceptable. It has been added to your file as part of the record.

Sincerely yours,

Joanne I. Miller Product Manager (23) Fungicide-Herbicide Branch Registration Division (H7505C)

Enclosure

CONCURRENCES								
SYMBOL	H7505C							
SURNAME	D. KENNY					Į.	[*****************
DATE	7/1/91			<u> </u>	***********			***************************************
SPA Form	1320-1 (12-70)		+U.:	C. CPO: 1989-424-485	V10104		OFFICE	AL EU E CORY

Under the Federal Insecticite, Dir golde, and Recienticide Act as amended, for the pesticide

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Des Plaines, IL 60018

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER Corrosive, causes eye damage. Do not get in eyes, on skin, or on clothing. face shield and chemical resistant gloves when handling. Harmful if swallowed. If in eyes flush with water for 15 minutes. Get medical attention. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. **ENVIRONMENTAL HAZARDS** This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters. Apply this product only as directed on label. Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination. PHYSICAL HAZARDS DO NOT USE, POUR, SPILL OR STORE NEAR HEAT OR OPEN FLAME. DIRECTIONS FOR USE It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. 3 Do not apply this product through any type of irrigation system. Refer to the DIRECTIONS FOR USE booklet attached to this container for proper use directions and additional precautionary statements. STORAGE AND DISPOSAL **PROHIBITIONS** Do not contaminate water, food or feed by storage or disposal.

STORAGE

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

PESTICIDE DISPOSAL

Pesticide wastes are toxic. Imple mase pesticide from containers and use misates in the pesticide application. Improper discosal of excess pesticide, spray mixture, or misate. As 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

Plastic or Metal: After triple rinsing (or equivalent), offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

LIMITATION OF WARRANTY AND LIMITATION OF LIABILITY

NOTICE: Read this Limitation of Warranty and Limitation of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Sandoz or seller. All such risks shall be assumed by buyer or user. Sandcz warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, under normal use conditions, subject to the risks described above. Sandoz makes no other express or implied warranty of fitness or of merchantability or any other express or implied warranty. In no event shall Sandoz or seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. The exclusive remady of the user or buyer, and the exclusive liability of Sandoz or seller for any and all claims, losses, injuries or damages (including claims based on breach of warranty, contract, negligence, tort, strict liability or otherwise) resulting from the use or handling of this product, shall be the return of the purchase price of the product or, at the ekction of Sandoz or seller, the replacement of the product. Sandoz and seller offer this product, and buyer and user accept it, subject to the foregoing limitations of warranty and limitation of liability, which may not be modified by any oral or written agreement.

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BANVEL* 526	Directions for Use)
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RIGHTS-OF-WAY, FOREST AND A	HOSH SEETINGERING WEST NO KRITHIOAT No SIMITAT WONERSON SEATIONAREAS
ACTIVE INGREDIENTS:	
Dicamba (3,6-dichloro-o-anisic Isooctyl ester of 2,4-dichloroph	acid)
INERT INGREDIENTS	TOTAL 100.0%
This product contains I lb. dica	mba per gʻilon (120 g/L).
This product contains 22.6% 2	
(2,4-D) or 1.9 lbs. per j Isomer specific by AOAC meth	**************************************
Contains petroleum distillates	·
ROLL OR SHAKE CONTAIN	ER BEFORE USING OF REACH OF CHILDREN
	DANGER
•	eutionary statements and statement ent at the beginning of this booklet
EPA Reg. No. 55947-19 Net Contents:	EPA Est. No. 55947-TX-1 Sandoz Crop Protection Corporation Des Plaines, IL 60018
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6 7	The Receive Brack of the Receive Brack of the Receive Brack of the Receive Section of the Receive Section Brack of the Receive Secti
8 9 10	Before applying Banvel 520, read all directions and precautions appearing on the container label and in this bookiet. Failure to follow all directions and precautions may result in unsatisfactory weed control, crop injury, or illegal residues.
11 12	Do not contaminate irrigation ditches or water used for domestic purposes.
13 14 15	Do not apply this product through any type of irrigation system.
16 17 28	PRECAUTIONARY STATEMENTS
19 20	HAZARDS TO HUMANS AND DOMESTIC ANIMALS
21 22	DANGER
23 24 25 26 27	Corrosive, causes eye damage. Do not get in eyes, on skin, or on clothing. Wear goggles of face shield and chemical resistant gloves when handling. Harmful if swallowed. If in eyes flush with water for 15 minutes. Get medical attention. Wash thoroughly with soap an 1 water after handling. Remove contaminated clothing and wash before reuse.
28 29	STATEMENT OF PRACTICAL TREATMENT
30 31 32 33 34 35	IF SWALLOWED Drink 1 or 2 glasses of water. Do not induce vomiting. Get medical attention immediately. IF IN EYES Flush with plenty of water. Get nedical attention it irritation persists. IF ON SKIN Wash with plenty of soap and water. Get medical attention if irritation persists or develops.
36 37	ENVIRONMENTAL HAZARDS
38 39 40 41 42 43	eankapitering akkain elektristike angerte bellike angertalike elektristike angertalike angertalike kangertalik Ingerte og verktiga te dikapitek konger en et ministike og te ekkristike kongertalike kongertilike konger en e materi elektristike viketingen af konger en et ministike og te elektristike kongrafike i de et biografike kong Apply anikapite i progressi i Sarante se et en konger en et en
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CHENNAGE AND HAR PROTECTING HEAT (OF NO. N. C.)

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Do not apply in areas which may be grazed by livestock or cut for hay within 1 year of application.

Banvel 520 Herbicide may cause injury to desirable trees or plants, particularly beans, cotton, flowers, fruit trees, grapes, ornamentals, peas, potatoes, soybeans, sunflowers, tobacco, tomatoes, and other broadleaf plants when contacting their roots, stems, or foliage. Plants are most sensitive to Banvel 520 Herbicide during their development or growing stage. FOLLOW ALL PRECAUTIONS WHEN USING BANVELS 20 HERBICIDE.

•Do not apply to areas where possible downward soil movement or surface washing may cause contact of Banvel 520 Herbicide with the roots of desirable plants, trees and shrubs.

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• Avoid making application when spray particles may be carried by air currents to areas where sensitive crops and other desirable plants are growing. Always make application when there is some air movement in order to determine the direction and distance of possible spray drift. Leave an adequate buffer zone between the treated area and desirable sensitive plants. Coarse sprays are less likely to drift out of target area.

•To avoid injury to desirable plants, equipment used for Banvel 520 Herbicide should be thoroughly cleaned (see PROCEDURE FOR CLEANING SPRAY EQUIPMENT) before handling or applying any other chemical.

• Aerial application should be made with extreme care to prevent off-target drift. An adequate buffer zone must be maintained between the treated area and desirable sensitive plants. Observe all drift precautionary statements described in this label.

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Application of Banvel 520 Herbicide may injure newly seeded grasses. Furthermore, rates in excess of 1 1/2 pints per treated acre may cause stunting of sensitive established grass species such as bentgrass and St. Augustine grass. Treatments will kill or injure alfalfa, clovers, lespedeza, wild winter peas, vetch and other legumes.

Consult your local or state authorities for possible application restrictions and advice concerning special local use situations.

PROCEDURE FOR CLEANING SPRAY EQUIPMENT:

The steps listed below are suggested for thorough cleaning of spray equipment following applications of Banvel 520 Herbicide again or tank mixtures.



- 1. Rinse with a small quantity of kerosene or diesel oil. Circulate the liquid throughout the spray system, pumping it through the hose and nozzles for at least two minutes. Flush by operating sprayer until the system is purged of liquid.
 - 2. Fill tank with water while adding 2 lbs. of detergent for every 40 gallons of water. Operate the pump to circulate the detergent solution through the sprayer system for 5 to 10 minutes and discharge a small amount of the solution through the boom and nozzles. Let the solution stand for several hours, preferably overnight.
 - 3. Flush the detergent solution out of the spray tank through the boom.

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- 4. Hose down thoroughly the inside as well as outside surfaces of equipment while filling the spray tank half full of water. Flush by operating sprayer until the system is purged of the rinse water.
- 5. Fill tank with water while adding 1 quart of household ammonia for every 25 gallons of water. Operate the pump to circulate the ammonia solution through the sprayer system for 15 to 20 minutes and discharge a small amount of the ammonia solution through the boom and nozzles. Let the solution stand for several hours, preferably overnight.
- 7. Remove the nozzles and screens and flush the system with two full tanks of water.

6. Flush the solution out of the spray tank through the boom.

BRUSH AND VINES CONTROLLED

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4	suppression of many woody brush and vine specie	including:
5	•	•
6	ailanthus	* mesquite
7	alder	oak
8	apple	oak, poison
9	ash	* peppertree, Brazil
10	aspen	(Florida holly,
11	basswood	Schinus)
12	beech	persimmon,
13	* birch	easterm
14	* blackberry	pine
15	blackgum	plum, sand
16	cascara.	(wild plum)
17	* cherry	poplar
18	chinquapin	* rabbitbrush
)°	* condalia, lotebush	* redcedar, eastern
<i>2</i> o	(lote)	rose, McCartney
21	cottonwood	rose, multiflora
22	creosotebush	sagebrush,
23	cucumbertree	fringed
24	* dewberry	sassafras
25	dogwood	serviceberry
26	* elderberry	snowberry,
27	elm	western
28	fir	(buckbrush)
29	gтape	spicebush
30	guava	spruce
31	hawthorn	sweetgum
32	(thornapple)	sum ₂ c
33	hemlock	sycamore
34	hickory	tarbush
<i>L</i> i5	honeysuckle	trumpetcreeper
36	hornbeam	(buckvine)
37	* huckleberry	waxmyrtle
38	huisache	willow
39	ivy, poison	witchhazel
40	kudzu	* yaupon
41	locust, black	yucca
42	* maple	
43	* melaleuca	
44	(cajeput tree)	
45		, , , , , , , , , , , , , , , , , , , ,

^{*} When treating noted species, use the more concentrated of the spray mixtures roommended on pages

MIXING AND APPLICATION

MIXING

Banvel 520 Herbicide is an oil soluble formulation which can be applied using oil **GENETICE** TO prepare oil in water emulsions, follow the unixing sentence described under LOW OIL SPRAY TREATMENTS. When tank mixing with other herbicides, read and follow the instructions on the label of all products used concerning mixing and application. A COMPATIBILITY TEST should be made prior to any tank mixing.

MAINTAIN AGITATION DURING SPRAY OPERATION TO PREVENT OIL AND WATER FROM FORMING SEPARATE LAYERS.

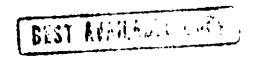
Spray additives may be used for improved wetting and penetration. Read and rollow all use recommendations and precautions on each product label.

APPLICATION

Banvel 520 Herbicide may be applied as a stump or basal treatment or as a dormant stem treatment using high volume ground, low volume ground, or aerial application equipment in an oil or low oil spray. Volume of spray applied will depend on the height, density, and type of weeds or brush being treated and the type of equipment being used. Apply 10 to 40 gallons of diluted spray per treated acre when using aerial application equipment. Refer to the GRAZING AND HARVESTING RESTRICTIONS and SENSITIVE CROP PRECAUTIONS sections for drift precautionary statements.

STUMP or BASAL treatments may be made by applying Banvel 520 Herbicide at any time during the year, including winter (except when snow or water prevents spraying to the ground line or when extreme cold causes the spray mixture to freeze). A drench treatment may be made by spraying the entire stump until runoff or, if making a basal application, by spraying the basal parts of the brush and tree trunk (particularly bark and exposed roots) from the ground line up to a height of two feet. The soil surface around the stump should also be sprayed. Application may be made either as a hydraulic high volume or as a manual or powered low volume backpack treatment.

DORMANT STEM treatments may be made by applying Banvel 520 Herbicide when most of the foliage has dropped off or at any time of the year when foliage does not inhibit spray coverage of the stem. Spray the collar at ground line and each stem until runoff, with special emphasis on covering the root crown. Hydraulic high volume, manual or powered low volume backpack or aerial treatments may be made.



DIL SPRAY TREATMENTS Conventional Basal Bark Treatments (Hydraulic or Backpack) For treatment of approximately 1 acre: Mix 3 to 6 gallons of Banvel 520 Herbicide in sufficient oil or other suitable diluents to make 100 gallons of spray mixture. Low Volume Basal Bark Treatment (Backpack) For control of brush with stems up to 6 inches in basal diameter. Mix 40-50 gallons of Banvel 520 Herbicide in sufficient oil or other suitable diluents to make 100 gallons of spray mixture to treat a minimum of 20 acres, depending on the density of brush. Use lower rates when tank mixing with other registered herbicides. Use low pressure and a solid cone or flat fan nozzle. Spray the lower 2 feet of the brush, including the root collar area, to the point of wet, but not to the point of run-off. Dormant Stem Treatment (Hydraulic or Backpack) For treatment of approximately 1 acre: Mix 3 to 6 gallons of Banvel 520 Herbicide in sufficient oil or other suitable diluent to make 100 gallons of spray mixture.

Cut stump treatment (Hydraulic or Backpack)

To control resprouting of freshly cut or old cut stumps. For conventional treatment, mix 3-6 gallons of Banvel 520 in sufficient oil or other suitable diluent to make 100 gallons of spray mixture for treatment of 1 acre. For low volume treatment, mix 40-50 gallons of Banvel 520 Herbicide in oil or other suitable diluent to make 100 gallons of spray mixture to treat a minimum of 20 acres. Spray to cover the entire stump including any exposed roots. Use lower rates when tank mixing with other registered herbicides.

LOW OIL SPRAY TREATMENTS

A low oil treatment may be applied at any time of the year for brush control (except when snow or water prevents spraying to the ground line or when extreme cold causes freezing of the spray mixture) as a hydraulic high volume spray treatment. When using low oil treatments, following the mixing source listed below:

- With continuous agitation, add half the desired amount of water to the spray tank.

Step 2 - Add the amount of multiple required for the spray volume being mixed.



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 Step 3. - Add the amount(s) of <u>chemical(s)</u> (BANVEL-520 herbicide or BANVEL-520 herbicide and a tank mix product recommended by this label) necessary for the total volume of spray being mixed.

- Add the amount of oil required. Finally, add the remaining amount of water needed to bring the spray mixture to the desired volume, maintaining constant agitation in the spray tank throughout mixing. (Note: A premix of BANVEL 520 Herbicide and oil may, with constant agitation, be added to the water-invisite; mix in place of the last two steps of this sequence.)

Low Oil Mixing Table

	Gallons of Mix*				
Means of Application	Water	Emulsifier	Chemical	Oil	Total
Hydraulic	89.4	0.5	3	10	
	to		to	to	
High Volume	78.5	0.5	6	15	100

*Adjust volumes of spray components proportionately when mixing volumes other than those listed. Do not apply more than 6 gallons of BANVEL 520 Herbicide per treated acre per growing season.

TANK MIX TREATMENTS

Read the label of each tank mix product and follow the more restrictive of the precautionary statements, limitations, and directions for use. No label dosage rate may be exceeded. This product must not be mixed with any product whose label prohibits such mixing. Water soluble products may be applied as a low oil spray treatment only. BANVEL 520 can be tank mixed with other registered herbicides for improved residual or broader spectrum of control.

Due to the variations that may occur in formulated products and specific use ingredients (e.g. water supplies), a COMPATIBILITY TEST is recommended prior to actual tank raixing.

COMPATIBILITY TEST

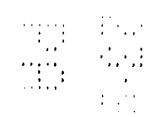
Before mixing in the spray tank, it is advisable to test compatibility by mixing all components in a small container in proportionate quantities.

First, determine the actual application method (low oil or oil treatment). Then, in the following table, find the appropriate vertical column and add the necessary spray components in the order listed. Shake the mixture after each component is added.

> Compatibility Mixing Chart for BANVEL 520 Herbicide (Assuming component volume is per 100 gallons spray mix)

	LOW OIL TREATMENT		OIL TREATMENT	
		Level		Level
Spray Component	Gallons	Teaspoons	<u>Gallons</u>	<u>Teaspoons</u>
Carrier	one quart water		one quart oil	
Herbicide(s)	3 6 18	3 6 18	3 6 18	3 6 18
Emulsifier	1/4	1		
Oil	10 15	10 15	-	

The complete test mixture should not separate into layers for at least 5 minutes. Should separation occur earlier, repeat the test by decreasing the amount of oil, by increasing the amount of emulsifier, or by adding a compatibility agent or spray adjuvant. 1/4 teaspoon of compatibility agent is equivalent to 2 pints per 100 gallons of spray solution.



LIMITATION OF WARRANTY AND LIMITATION OF LIABILITY

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REGISTERED TRADEMARKS

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BANVEL is a registered trademark of Sandoz Ltd.