PM-23

Reg # 62719-5

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

july 16

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LARRY E. HAMMOND DOWELANCO 9330 ZIONSVILLE ROAD INDIANAPOLIS, IN. 46268 OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Subject:

Label Amendment Submission of 11/19/93 in Response to PR Notice 93-7

EPA Reg. No. 62719-5

TORDON 101 HERBICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling AND
- WITHIN one year from date of this acceptance.



Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Deak (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mali 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,

Jim Tompking, Deputy Chief Registration Support Branch Registration Division (7505W)

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division

Larry E. Hammond DOWELANCO 9330 ZIONSVILLE RD INDIANAPOLIS IN 46268

Comment for: EPA Reg Nr.62719-5 TORDON 101 HERBICIDE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

The statement on your proposed label that references the Agricultural Use Requirements box in your proposed supplemental labeling contains incorrect language. Use the exact text and placement of the referral statement as shown on page 43 in Supplement Three to PR Notice 93-7.

4411

Labeling amended to meet the requirements of the Worker Protection Standard (WPS), the 2,4-D Exposure Reduction Program, and as required by WPS Guidance for 2,4-D. (EPA text dated 06/18/91 plus ERP and WPS)

[EDITOR'S NOTE: Strike-through text denotes deletions; Underlined text denotes additions.]

[Datapack -- Tordon 101 Mixture]

RESTRICTED USE PESTICIDE

May Injure (Phytotoxic) Susceptible, Non-Target Plants. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Commercial certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

(logo) DowElanco

Tordon* 101 Mixture

A weed and brush herbicide for control of unwanted annual and perennial broadleaved weeds and woody plants and vines on forest planting sites and non-crop areas including industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, highways, railroads and wildlife openings in forest and non-crop areas

Active Ingredient(s):

2,4-dichlorophenoxyacetic acid - 21.2% - 2 lb/gal

Keep Out of Reach of Children

WARNING AVISO

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

Refer to label booklet for additional precautionary information including Personal Protective Equipment (PPE), Engineering Controls Statements and User Safety Recommendations, and Directions for Use Including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" inside label booklet.

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

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

EPA Reg. No. 62719-5

87120

EPA Est. 464-MI-1 900-00xxxx ACCEPTED with COMMENTS

*Trademark of DowElanco
DowElanco • Indianapolis, IN 46268, U.S.A.

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Specialty Herbicide

linder the Federal Insecticide, Fundicide, and Rodentleide Act no amonded, for the peticide regimered under EPA Reg. No.

In EPA Letter Dated

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[Page 2 of Booklet]

Precautionary Statements

Hazards to Humans and Domestic Animals

AVISO:

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le hava sido explicada ampliamente.

Si usted no entiende la etiqueta, busque a alquien 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.)

Causes Substantial But Temporary Eye Injury - Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Skin Reactions in Some Individuals - Harmful If Swallowed Or Absorbed Through Skin

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

Wash hands, face and arms with soap and water as soon as possible after mixing. loading or applying this product. Wash hands, face arms with soap and water before eating, smoking or drinking. Wash hands and arms before using the tollet.

After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during previous days mixing, loading or application of this product. Clothing must be kept and washed separately from other household laundry. Remove saturated-clothing as soon as possible and shower. (Editor's note: The above personal hygeine statements were incorporated into User Safety Recommendations)

Note: For containers of over 1 gallon, but less than 5 gallons: Persons engaged in pouring this product must also wear coveralls or chemical resistant apron.

For containers of 5 gallons or more: A mechanical transfer system (probe and pump) must be used for transfering the contents of the container. If the contents of a non-refillable posticide container are emptied, the probe must be rinsed before removal.

(Editors note: The two statements immediately above have been incorporated into the "PPE" and "Engineering Controls" sections.)

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 C on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Butvl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride (PVC), or Viton
- Shoes plus socks
- · Protective evewear
- For containers of over 1 gallon, but less than 5 gallons; Mixers and loaders who do not use a mechanical system (such as probe and pump) to transfer the contents of this container must wear coveralls or a Chemical-resistant apron in addition to other required PPE.

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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. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Controls Statements:

For containers of 5 gallons or more: A mechanical system (such as probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170,240 (d) (4)), the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

User Safety Recommend tions

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.

First Aid

If in eyes: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention promotly.

If swallowed: Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Call a physician. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin: Flush skin with plenty of water. Get medical attention if irritation persists.

Environmental Hazards

Drift or runoff may adversely affect nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Picloram is a chemical which can travel (seep or leach) through soil and under certain conditions has the potential to contaminate groundwater which may be used for irrigation and drinking purposes. Users are advised not to apply picloram where soils have a rapid to very rapid permeability throughout the profile (such as loamy sand to sand) and the water table of an underlying aquifer is shallow or to soils containing sinkholes over limestone bedrock, severely fractured surfaces, and substrates which would allow direct introduction into an aquifer. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater.

An aquiter is defined as "an underground, saturated, permeable, geologic torrnation capable of producing significant quantities of water to a well or spring. It is the ability of the saturated zone, or portion of that zone, to yield water which makes it an aquifer" (American Chemical Society, 1983).

Physical or Chemical Hazards

Combustible -- Do not use or store near heat or open flame. Do not cut or weld container.

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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, decentamination, 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 such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride (PVC), or Viton
- Shoes plus socks
- Protective eyewear

Storage and Disposal

Do not contaminate water, food, fertilizer or feed by storage or disposal. Open dumping is prohibited. **Storage:** Keep Container tightly closed when not in use. If exposed to subfreezing temperatures, the product should be warmed to at least 40°F and mixed thoroughly before using.

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 cannot be used 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.

Metal Container Disposal: Do not reuse container. Triple rinse (or equivalent). 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). 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.

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

Sprayer Clean-Out: To avoid injury to desirable plants, equipment used to apply Tordon 101 Mixture should be thoroughly cleaned before reusing to apply any other chemicals.

- 1. Rinse and flush application equipment thoroughly after use. Dispose of rinse water in non-cropland area away from water supplies.
- Rinse a second time, adding 1 of thousehold ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15-20 min.). Let the solution stand for several hours, preferably overnight.
- 3. Flush the solution out of the spray tank through the boom.
- Rinse the system twice with clean water, recirculating and draining each time.
- 5. Nozzles and screens should be removed and cleaned separately.

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General information

Tordon 101 Mixture weed and brush herbicide is recommended for control of unwanted annual and perennial broadleaved weeds and woody plants and vines on forest planting sites and non-crop areas including industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, highways, railroads and wildlife openings in forest and non-crop areas.

Use Tordon 101 Mixture weed and brush herbicide at rates of 1/2 to 2 gallons per acre to control broadleaved weeds and at rates of 1 to 2 gallons per acre to control woody plants and vines. Tordon 101 Mixture may be tank mixed with Garlon 4, or Garlon 3A herbicides, or 4 lb/gal 2,4-D low-volatile esters registered for sites listed on this label to control mixed woody plant and vine species. When tank mixing, observe all precautions, directions, and limitations on both products labeling. In all cases use the amounts specified in enough water to give thorough and uniform coverage of the plants to be controlled.

Note: Tordon 101 Mixture does not mix readily with oil. Use of a non-ionic agricultural surfactant, such as Ortho X-77, Triton AG-98, or Tronic, is recommended for all applications. When using surfactants, follow the use directions and precautions listed on the surfactant manufacturer's label. Use the higher recommended concentrations of surfactant in the spray mixture when applying lower spray volumes per acre.

General Use Precautions

Use this product only as specified on this label. Observe any special use and application restrictions and limitations, including method of application and permissible areas of use as promulgated by state authorities.

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

Do not use for manufacturing or formulating.

Be sure that use of this product conforms to all applicable regulations.

Do not make application when circumstances favor movement from treatment site.

Do not rotate food or feed crops on treated land if they are not registered for use with picloram until an adequately sensitive bioassay or chemical test shows that no detectable picloram is present in the soil.

Do not move treated soll to other areas or use it to grow plants if they are not registered for use with picloram until an adequate sensitive bioassay or chemical test shows that no detectable picloram is present in the soil.

Do not spray If the loss of forage legumes cannot be tolerated. Tordon 101 Mixture may injure or kill legumes. New legume seedlings may not grow within 2 years following application of this herbicide.

Do not transfer livestock from treated grazing areas onto sensitive broadleaf crop areas without first allowing 7 days of grazing on an untreated grass pasture. Otherwise, urine may contain enough picloram to cause injury to sensitive broadleaf plants.

Do not use manure from animals grazing treated areas on land used for growing broadleaf crops, ornamentals, orchards or other susceptible, desirable plants. Manure may contain enough picloram to cause injury to susceptible plants.

Do not use grass or hay from treated areas for composting or mulching of susceptible broadleaf plants.

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Do not contaminate water intended for irrigation or domestic purposes. To avoid injury to crops or other desirable plants, do not treat or allow spray drift or run-off to fall onto banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes. Do not apply to snow or frozen ground.

Do not apply or otherwise permit Tordon 101 Mixture or sprays containing Tordon 101 Mixture to contact crops or other desirable broadleaf plants including but not limited to affalfa, beans, cotton, grapes, melons, peas, potatoes, safflower, soybeans, sugar beets, sunflower, tobacco, tomatoes, and other vegetable crops, flowers, fruit plants, ornamentals or shade trees.

Tordon 101 Mixture should not be applied on residential or commercial lawns or near ornamental trees and shrubs. Untreated trees can occasionally be affected by root uptake of herbicide through movement into the top soil or by excretion of the product from the roots of nearby treated trees. Do not apply Tordon 101 Mixture within the root zone of desirable trees unless such injury can be tolerated.

Avoid Injury to newly planted conifers. Conifer planting intervals vary. Pines planted sooner than six months after treatment with Tordon 101 Mixture may be injured in the south or west of the Cascade Mountains. Other conifers, west of the Cascade Mountains, may be injured if planted sooner than 8 to 9 months after treatment. For all conifers, the waiting period treatment and planting should be 11 to 12 months in the area between the Cascade and Rocky Mountains and 8 to 9 months in the lake States and the Northeastern U.S.

Avoid 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 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, use Nalco-Trol drift control additive as recommended by the manufacturer or apply the Microfoil or Thru-Valve boom or use an equivalent drift control system. Thickened sprays prepared by using high viscosity invert systems or other drift control additives or systems may be utilized if drift control is comparable to that obtained with Nalco-Trol or the Microfoil or Thru-Valve boom. If a spray thickening agent is used, follow all use recommendations and precautions on the product label. Do not use a thickening agent with the Microfoil boom, or other systems that cannot accommodate thick sprays.

With aircraft, drift can be lessened by applying a coarse spray; by using spray pressures no greater than are required to obtain adequate plant coverage; by using straight stream nozzles directed straight back; by spraying only when wind velocities are low; or by using approved drift control system.

Ground Equipment: To aid in reducing spray drift, Tordon 101 Mixture should be used in thickened (high viscosity) spray mixtures using Nalco-Trol drift control additive 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 using spray pressures no greater than are required to obtain adequate plant coverage; and by spraying when wind velocity is low. Do not apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray.

High Volume Leaf-Stem Treatment: Spray drift may be minimized by using spray pressures no greater than are required to obtain adequate plant coverage and spraying no higher than brush tops. Avoid excessive pressures which result in formation of fine spray mists. Nalco-Trol thickening agent or equivalent may be used to reduce spray drift. Do not apply this product through a mist blower.

Mixing and Loading

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.

weed

Plants Controlled by Tordon 101 Mixture

Annual and Perennial Broadleaved Weeds Controlled by Tordon 101 Mixture

goldenrod bindweed, field rush skeleton horsenettle bouncinabet carrot, wild knapweed sowthistle milkweed chicory spurge, leafy plantain starthistle, yellow clover dandelion prickly lettuce thistles dock ragweed toadflax fleabane ragwort, tansy vetch

Woody Plants and Vines Controlled by Tordon 101 Mixture

fir, balsam persimmon ailanthus pine alder gorse aspen gum poison oak birch hemlock sassafras sourwood blackberry hickory bracken fern honeysuckle spruce buttonbush kudzu sumac cherry locust tulip poplar Douglas fir wild rose maple willow elm oak

Approved Uses

Forestry Uses

Agricultural Use Regultements for Forestry Uses: For the following uses on forestry sites. follow PPE and Reentry instructions in the "Agricultural Use Requirements" section of this label.

Non-cropland Uses

Use Requirements for Non-cropland Areas: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is applied to non-cropland areas.

High Volume Leaf-Stem Treatment

Use Tordon 101 Mixture at the rate of 1 gallon in water to make 100 gallons of spray to control broadleaved weeds, vines and other woody plants. To control a wider range of plant species, mix 1/4 to 1/2 gallon of Tordon 101 Mixture with 1 to 3 quarts of Garlon 4 herbicide or 1 to 4 quarts of Garlon 3A Herbicide or 4 lb/gal 2,4-D low-volatile ester and dilute to make 100 gallons of spray. Apply after the foliage is well developed and in a manner to give thorough spray coverage. For woody plants, apply the spray mixture in a manner which thoroughly wets all leaves, stems and root collars: For hard-to-kill species, such as ash and oak, also wet the soil around the root collar. The amount of spray mixture applied per acre will vary with plant size and density; however, total use of Tordon 101 Mixture should not exceed 8 quarts per acre.

Note: Do not allow the spray, even as minute amounts of spray drift, to contact desirable broadleaf plants, and do not wet the soil over roots of suc., plants.

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Broadcast Ground or Aerial Foliage Treatment

To obtain adequate plant coverage, it is recommended that ground applications of Tordon 101 Mixture be made in 15 or more gallons of total spray mixture per acre. For aerial applications, use of 5 to 20 gallons per acre of spray mixture is recommended. Use higher spray volumes where plants are tall, where the vegetation to be treated is dense, or where difficult to control species are present.

Broadleaved Annual and Perennial Weed and Woody Vine Control
Use Tordon 101 Mixture weed and brush herbicide at rates of 2 quarts to 2 gallons per acre in a water
spray mixture. Apply to problem weeds and vines any time after growth begins in the spring and late in
summer or fall.

For seasonal control of vigorously growing stands of field bindweed, Canada thistle or mixtures of these with susceptible annual weeds such as ragweed, dandelion, plantain, clovers and dock use 2 to 3 quarts of Tordon 101 Mixture per acre in water spray.

In arid areas and for control of more resistant perennial weeds use 1 to 2 gallons of Tordon 101 Mixture per acre. Use 1 to 1.5 gallons per acre to control species such as Canada thistle, field bindweed and milkweed. The higher rates should be used under drought stress conditions and for the more resistant species such as bouncingbet, leafy spurge, toadflax and woody vines. The spectrum of activity can be improved by tank mixing 1/2 to 1 gallon of Tordon 101 Mixture with 1/3 to 1 gallon of Garlon 3A or 1 to 3 quarts of Garlon 4 per acre.

Woody Plant Control

Use Tordon 101 Mixture at the rate of 1 to 2 gallons per acre in a water spray mixture.

For susceptible seedling stages of species such as aspen, cherry, and sumac use 1 to 1.5 gallons of Tordon 101 Mixture per acre in a water spray mixture.

For more mature and/or less susceptible species such as Poison oak, blackberries, Douglas fir, willow, buttonbush, black locust, sassafras, sumac, tulip poplar and cherry use 2 gallons of Tordon 101 Mixture per acre in a water spray mixture.

For more resistant brush such as maple, pine, sourwood, blackgum, cedar and oak and to improve the spectrum of species controlled, 1 to 2 gallons of Tordon 101 Mixture per acre can be tank mixed with 1/2 to 2 gallons per acre of Garlon 3A, Garlon 4 or 4 lb/gal 2,4-D low-volatile ester.

Note: For best results under conditions of drought stress, use the higher rates recommended. Even these rates under such conditions may not be as effective as the lower rates under good growing conditions.

Broadcast Treatments for Forest Site Preparation (not for conifer release)

For broadcast applications apply the recommended rate of Tordon 101 Mixture in a total spray volume of 5 to 25 gallons per acre by air or 10 to 100 gallons per acre by ground. Use spray volumes sufficient to provide thorough coverage of treated foliage. Use application systems designed to prevent spray drift to off-target sites. Nozzles or additives that produce larger droplets may require higher spray volumes to provide adequate coverage. Note: This use is not intended for conifer release (see precautions).

Southern States Including Alabama, Arkansas, Delaware, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Tennessee, Texas and Virginia

To control susceptible woody plants and broadleaf weeds, apply Tordon 101 Mixture at a rate of 6 to 8 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 6 to 8 quarts per acre of Tordon 101 Mixture in tank mix combination with 2 to 4 quarts per acre of Garlon* 4 herbicide. Where grass control is also desired, Tordon 101 Mixture, alone or in combination with Garlon 4, may be tank mixed with 1 to 4 quarts per acre of Accord or Roundup herbicide, or 8 to 16 fluid ounces per acre of Arsenal Applicator's Concentrate herbicide. Susceptible woody plants, broadleaf weeds and grasses may also be controlled using a tank mix of 6 to 8 quarts per acre of Tordon 101 Mixture and 3 to 5 quarts of Accord or Roundup herbicide, or 16 to 24 fluid ounces of Arsenal Applicator's Concentrate.

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When applying tank mixes, follow use directions and precautions on each product label.

In Western, Northeastern, North Central and Lake States (States not listed above as Southern States)

To control susceptible woody plants and broadleaf weeds, apply Tordon 101 Mixture at a rate o: 4 to 8 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 4 to 8 quarts per acre of Tordon 101 Mixture in tank mix combination with 1.5 to 3 quarts of Garlon 4. Where grass control is also desired, Tordon 101 Mixture, alone or in tank mix combination with Garlon 4, may be applied with 1 to 3 quarts per acre of Accord or Roundup, 2 to 4 fluid ounces of Oust, a combination of Accord (or Roundup) plus Oust at the rates listed, or 8 to 16 ounces of Arsenal Applicator's Concentrate. When applying tank mixes, follow the use directions and precautions on each product label.

Conifer Strip Thinning in the Northeastern United States

To thin stands of naturally regenerated spruce and fir by applying herbicide in treated bands or strips which alternate with untreated bands or strips, apply Tordon 101 Mixture—such that the application rate in the treated bands or strips is 2 to 3 gallons of herbicide per acre in a total spray mixture volume of 12 to 20 gallons. For best results, apply during the period of active conifer growth. To obtain the precise placement of spray mixture in the treated bands that is required for this technique, aerial applications should be made using a helicopter equipped with Microfoil or Thru-Valve boom. Multiple treated bands may be obtained within a single spray swath by establishing alternating series of flowing and blocked spray nozzles.

NOTE: Injury or death of desired residual conifers may result if spray mixture is permitted to contact their foliage as a result of inaccurate flight guidance during aerial application or as a result of spray drift from treated into untreated strips.

Cut Surface Treatments

In forest and other non-crop areas to kill unwanted trees such as elm, maple, oak and pine apply Tordon 101 Mixture, either undiluted or diluted in a 1 to 1 ratio with water, as directed below.

With Tree Injector Method

Application should be made by injecting 1/2 milliliter or undiluted Tordon 101 Mixture or 1 milliliter of the diluted solution through the bark at intervals of 3 inches between edges of the injector wound. The injections should completely surround the tree at any convenient height.

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

With Frill or Girdle Method

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

Stuing Treatment

Spray or paint to wet the cut surfaces of freshly cut stumps or stubs with Tordon 101 Mixture undiluted or diluted 1:1 in water. All of the cambium area next to the bark is the most vital area to wet.

The above methods may be used successfully at any season except during periods of heavy sap flow of certain species such as maples or during drouthy periods. Untreated trees within a few feet of the treated trees or stumps may be injured or killed.

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Broadcast Cut Stubble Treatment

To prevent resprouting of susceptible woody species after mowing or hand cutting on non-crop areas and right-of-ways, use Tordon 101 Mixture at the rate of 2 to 4 gallons per acre in 25 or more gallons of a water spray mixture. Best results may be obtained when applications are made before or during periods of active root growth. Applications should not be made when the soil surface is frozen or covered by snow or standing water. It is recommended that applications be made soon after cutting, before sprouting of woody species has occurred.

Warranty Disclaimer

DowElanco 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. DOWELANCO 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 DowElanco or the seller. All such risks shall be assumed by Buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal heories), shall be limited to, at DowElanco'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.

DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is proximity notified of such loss or damage in writing. In no case shall DowElanco 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 DowElanco or the seller is authorized to vary or exceed the terms of the "Warranty Disclaimer" or this "Limitation of Remedies" in any manner.

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[Base Label of Datapack -- Tordon 101 Mixture]

RESTRICTED USE PESTICIDE

May Injure (Phytotoxic) Susceptible, Non-Target Plants. For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification. Commercial certified applicators must also ensure that all persons involved in these activities are informed of the precautionary statements.

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Tordon* 101 Mixture

A Weed and Brush Herbicide for control of unwanted annual and perennial broadleaved weeds and woody plants and vines on forest planting sites and non-crop areas including industrial manufacturing and storage sites, rights-of-way such as electrical power lines, communication lines, pipelines, highways, railroads and wildlife openings in forest and non-crop areas

Active Ingredient(s):

picloram: 4-amino-3,5,6-trichloropicolinic acid, as the triisopropanolamine salt	10.2%
2,4-dichlorophenoxyacetic acid, as the triisopropanolamine salt	39.6%
Inert Ingredients	50.2%
Acid equivalents:	

picloram: 4-amino-3,5,6-trichloropicolinic acid - 5.7% - 0.54 lb/gal 2,4-dichlorophenoxyacetic acid - 21.2% - 2 lb/gal

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

WARNING AVISO:

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

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.)

Causes Substantial But Temporary Eye Injury • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Skin Reactions in Some Individuals • Harmful If Swallowed Or Absorbed Through Skin

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

Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face arms with soap and water before eating, smoking or drinking. Wash hands and arms before using the toilet.

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After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during previous days mixing, loading or application of this product. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower. (Editor's note: The above personal hygeine statements were incorporated into User

Safety Recommendations)

Note: For containers of over 1 gallon, but less than 5 gallons: Persons engaged in pouring

this product must also wear coveralls or chemical resistant apron.

For containers of 5 gallons or more: A mechanical transfer system (probe and pump) must be used for transfering the contents of the container. If the contents of a non-refillable pesticide container are emotiod, the probe must be rinsed before removal.

(Editors note: The two statements immediately above have been incorporated into the "PPE" and "Engineering Controls" sections.)

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 C on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Butyl Rubber, Nitrile Rubber, Neoprene Rubber, Polyvinyl Chloride (PVC), or Viton
- Shoes plus socks
- Protective evewear
- For containers of over 1 gallon, but less than 5 gallons: Mixers and loaders who do not use
 a mechanical system (such as probe and pump) to transfer the contents of this container must wear
 coveralls or a Chemical-resistant apron in addition to other required PPE.

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. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Controls Statements:

For containers of 5 gallons or more: A mechanical system (such as probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

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 gluves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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First Aid

If In eyes: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention promptly.

If swallowed: Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Call a physician. Do not induce vomiting or give anything by mouth to an unconscious person. If on skin: Flush skin with plenty of water. Get medical attention if irritation persists.

Environmental Hazards

Drift or runoff may adversely affect nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. See additional Environmental Hazards under Precautionary Statements inside label booklet.

Physical or Chemical Hazards

Combustible -- Do not use or store near heat or open flame. Do not cut or weld container.

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

Refer to label booklet for additional precautionary information including Personal Protective Equipment (PPE), Engineering Controls Statements and User Safety Recommendations, and Directions for Use including Storage and Disposal.

Notice: Read the entire label. Use only according to label directions. Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies" inside label booklet.

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

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

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Specialty Herbicide

Revisions:

- 1) Added requirements of the Worker Protection Standard
- 2) Added requirements to comply with the 2.4-D Exposure Reduction Program.
- Label formatted to be compatible with requirements of the 2,4-D Exposure Reduction Program and Worker Protection Standard.