

PM 25

62719-6

12/29/98

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DEC 29 1998

Steve A. McMaster  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268-1054

Dear Mr. McMaster:

Subject: Sorghum Rotational Crop  
Tordon 22K Weed Killer  
EPA Registration No. 62719-6  
Your Submissions Dated September 25 and October 13, 1998

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(B) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) or 4(a) when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. For clarity, the heading "General Use Precautions" should be changed to "General Precautions and Restrictions"

b. Page 98 of the Picloram RED requires that the following Groundwater Statement appear in the Environmental Hazards section:

This chemical is know to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

You may also retain the current groundwater statements if modified to read as follows:

Picloram is a chemical which can travel (seep or leach) through soil and has the potential to contaminate groundwater which may be used for irrigation and drinking purposes. Users should especially avoid application of 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.

c. Modify the Entry Restrictions for Non-WPS Uses to read:

For applications on rangeland, permanent grass pastures, and non-cropland, do not allow worker entry into areas until sprays have dried, unless applicator and other handler PPE is worn.

d. On page 7 delete "Keep Out of Reach of Children". This statement is only required on the front panel. Delete "PRECAUCION". The WPS regulations require the Spanish language Signal Word on the front panel not in the Precautionary Statements.

e. On the front panel below the Brand Name delete "wildlife openings" since none of the registered uses: rangeland, permanent grass pastures, fallow cropland, wheat, barley, oats, rights of way, fence rows, around farm buildings, and CRP acres have wildlife openings.

f. For clarity on page 15 delete "Approved Uses" and specify the registered sites.

g. On page 15 delete "up to 4 quarts per acre as a spot treatment". This contradicts the maximum use rates on page 10 "Non-crop areas:...must not exceed 2 quarts per acre per annual growing season".

h. For rangeland and pastures the Picloram RED limits spot application to a maximum of 1.0 lb ae/A with no more than 50% of an acre being treated. Wherever it appears on the labeling modify the directions to reflect this restriction.

i. On page 1 under "Rangeland and Permanent Grass Pastures" specify "West of the Mississippi River" to be consistent with the front panel claims.

j. On page 10 of the label delete "Do not use for manufacturing or formulating".

k. In the middle of page 17 delete "Use only on land that will be planted the following year to grass, barley, oats, wheat or fallowed". The updated text appears at the bottom of the page.

3. Registration of this use will expire on December 31, 2000.

4. Submit one copy of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely yours,



James A. Tompkins  
Product Manager (25)  
Herbicide Branch  
Registration Division (7505C)

Enclosure

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(Base label):

**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) Dow AgroSciences LLC

**Tordon\* 22K**

For use in areas west of the Mississippi River for the control of susceptible broadleaf weeds and woody plants on rangeland and permanent grass pastures, fallow cropland, wheat, barley and oats not underseeded with a legume on grainland (which is not flood or sub-irrigated and not rotated to broadleaf crops), non-cropland, and on Conservation Reserve Program (CRP) acres and wildlife openings in these sites

Active Ingredient:

- picloram: 4-amino-3,5,6-trichloropicolinic acid, potassium salt ..... 24.4%
- Inert Ingredients ..... 75.6%
- Total Ingredients ..... 100.0%

Handwritten notes: 1/2 gal = 1 lb ae, 2 gts = 1 Ba e

Acid Equivalent

picloram: 4-amino-3,5,6-trichloropicolinic acid - 21.1% - 2 lb/gal

**Precautionary Statements**

**Hazards to Humans and Domestic Animals**

Keep Out of Reach of Children

**CAUTION**

**PRECAUCION**

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

**Causes Moderate Eye Irritation**

Avoid contact with eyes or clothing. Prolonged or frequent repeated skin contact may cause allergic skin reactions in some individuals.

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

DEC 29 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

2279-6

## Personal Protective Equipment (PPE)

### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

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.
- Users should 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:** Flush eyes with plenty of water. Call a physician if irritation persists.

## Environmental Hazards

This pesticide is toxic to some plants at very low concentrations. Non-target plants may be adversely affected if pesticide is allowed to drift from areas of application. Do not apply directly to water, 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. Do not contaminate water used for irrigation or domestic purposes by cleaning of equipment or disposal of wastes. Do not allow run-off or spray to contaminate wells, irrigation ditches or any body of water used for irrigation or domestic purposes. Do not make application when circumstances favor movement from treatment site.

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 aquifer is defined as "an underground, saturated, permeable, geologic formation 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).

This chemical can contaminate surface water through spray drift. Under some conditions, picloram may also have a high potential for runoff into surface water (primarily via dissolution in runoff water). These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas over-laying extremely shallow ground water, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas over-laying tile drainage systems that drain to surface water.

**Note: Use in Hawaii limited exclusively to Supplemental Labeling. See "General Use Precautions" for details.**

**Agricultural Use Requirements**

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

**Refer to label booklet for 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 1-800-992-5994. If you wish to obtain additional product information, visit our web site at [www.dowagro.com](http://www.dowagro.com).

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

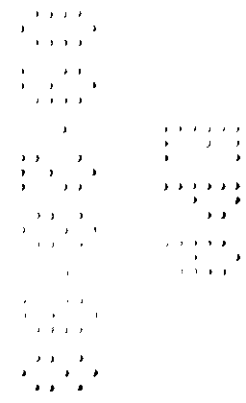
EPA Reg. No. 62719-6

EPA Est. 464-MI-1

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**Specialty Herbicide**

**Net Contents** \_\_\_\_\_



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(Datapack cover):

**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) Dow AgroSciences LLC

# Tordon\* 22K

For use in areas west of the Mississippi River for the control of susceptible broadleaf weeds and woody plants on rangeland and permanent grass pastures, fallow cropland, wheat, barley and oats not underseeded with a legume on grainland (which is not flood or sub-irrigated and not rotated to broadleaf crops), non-cropland, and on Conservation Reserve Program (CRP) acres and wildlife openings in these sites

Active Ingredient:

picloram: 4-amino-3,5,6-trichloropicolinic acid,	
potassium salt .....	24.4%
Inert Ingredients .....	75.6%
Total Ingredients .....	100.0%

Acid Equivalent  
 picloram: 4-amino-3,5,6-trichloropicolinic acid - 21.1% - 2 lb/gal

**Keep Out of Reach of Children**

## CAUTION

## PRECAUCION

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

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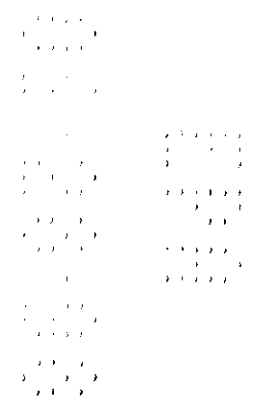
EPA Reg. No. 62719-6

EPA Est. 464-MI-1

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**Specialty Herbicide**

**Net Contents** \_\_\_





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## Precautionary Statements

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### Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

## CAUTION PRECAUCION

### Causes Moderate Eye Irritation

Avoid contact with eyes or clothing. Prolonged or frequent repeated skin contact may cause allergic skin reactions in some individuals.

### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks

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

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- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
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### First Aid

**If in eyes:** Flush eyes with plenty of water. Call a physician if irritation persists.

### Environmental Hazards

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**Note: Use in Hawaii limited exclusively to Supplemental Labeling. See "General Use Precautions" for details.**

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### Directions for Use

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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 12 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
- Waterproof gloves
- Shoes plus socks

#### Non-Agricultural Use Requirements

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

**Entry Restrictions for Non-WPS Uses:** Do not enter or allow worker entry into treated areas until sprays have dried, unless applicator and other handler PPE is worn.

### Storage and Disposal

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

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

**Container Disposal (Metal): 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.

**Container Disposal (Plastic): 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.

**Sprayer Clean-Out:** To avoid injury to desirable plants, equipment used to apply Tordon 22K herbicide 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.
2. Rinse a second time, adding 1 quart of household ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15 to 20 minutes). Let the solution stand for several hours, preferably overnight.
3. Flush the solution out the spray tank through the boom.
4. Rinse the system twice with clean water, recirculating and draining each time.
5. Nozzles and screens should be removed and cleaned separately.

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

### General Information

In areas west of the Mississippi River use Tordon 22K herbicide to control susceptible broadleaf weeds and woody plants on rangeland and permanent grass pastures, fallow cropland, wheat, barley and oats not underseeded with a legume on grainland (which is not flood or sub-irrigated and not rotated to broadleaf crops), non-cropland, and on Conservation Reserve Program (CRP) acres, and wildlife openings in these sites. **This product is NOT for sale or use in the San Luis Valley of Colorado.**

### 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 or local authorities.

**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 use on flood or sub-irrigated land.**

**Do not spray if the loss of forage legumes cannot be tolerated.** Tordon 22K may injure or kill legumes. New legume seedlings may not grow for several years following application of this herbicide.

**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 crops.

**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 apply** to snow or frozen ground. Application during very cold (near freezing) weather is not advisable.

**Tordon 22K 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 22K within the root zone of desirable trees unless such injury can be tolerated.

**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 soil** to areas other than those treatment sites for which Tordon 22K is registered for use. Also, do not use treated soil to grow plants for which use of Tordon 22K is not registered until an adequately sensitive bioassay or chemical test shows that no detectable residue of picloram is present in the soil.

**Maximum Use Rates:**

**Non-cropland Areas:** Total use of Tordon 22K, including retreatments or spot treatments, must not exceed 2 quarts per acre per annual growing season.

**Rangeland and Permanent Grass Pastures:** In noxious weed control programs, Tordon 22K may be applied at up to 2 quarts per acre per annual growing season as a broadcast treatment. Spot treatments may be applied at the equivalent broadcast rate of up to 2 quarts per acre.

For control of other broadleaf weeds and woody plants, Tordon 22K may be applied broadcast at up to 1 quart per acre per annual growing season. Spot treatments may be applied at an equivalent broadcast rate of up to 2 quarts per acre per annual growing season, but not more than 50% of an acre may be treated.

Repeat treatments may be applied as necessary, but total use must not exceed the maximum amount specified.

**To prevent damage to crops and other desirable plants,** read and follow all directions and precautions on this label and container before using.

**Do not use for manufacturing or formulating.**

**Do Not Mix With Dry Fertilizer.**

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

**In Hawaii,** approved uses of Tordon 22K are limited to those described in Supplemental Labeling. This Supplemental Labeling may be obtained from your Dow AgroSciences representative or chemical dealer. Refer to this Supplemental Labeling for specific use directions and precautions.

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

**Do not apply or otherwise permit Tordon 22K or sprays containing Tordon 22K to contact crops or other desirable broadleaf plants,** including but not limited to alfalfa, beans, grapes, melons, peas, potatoes, safflower, soybeans, sugar beets, sunflower, tomatoes, and other vegetable crops, flowers, fruit plants, ornamentals or shade trees or the soil containing roots of nearby valuable plants.

**Precautions for Avoiding Injurious Spray Drift**

Applications should be made to avoid spray drift since very small quantities of spray, which may not be visible, may seriously injure susceptible crops during both growing and dormant periods. To minimize spray drift, use low nozzle pressure; apply as a coarse spray; and use nozzles designed for herbicide application that do not produce a fine droplet spray. To aid in further reducing spray drift, a drift control and deposition aid such as Nalco-Trol may be used with this product. If such a drift control aid is used, follow all use recommendations and precautions on the product label. Do not use a thickening agent with the Microfoil or the Thru-Valve booms, or other systems that cannot accommodate thick sprays.

**Ground Equipment:** With ground equipment spray drift can be lessened 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 manufacturers recommended minimum pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers); by spraying when the wind velocity is low (follow state regulations). Avoid calm conditions which may be conducive to air inversions. In hand-gun applications, select the minimum spray pressure that will provide adequate plant coverage (without forming a mist).

**Aerial Application:** Avoid spray drift at the application site. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. Users 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  $\frac{3}{4}$  the length of the wingspan or 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 produced 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 downward. 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).

### Woody Plants and Broadleaf Weeds Controlled by Tordon 22K

#### Woody Plants:

absinth wormwood	junipers/cedars
aspen	locust
blackberries	multiflora rose
catclaw acacia	pinyon pine
chaparral sp.	rabbitbrush
fringed sagebrush	Scotch broom
gorse	

**Annual and Perennial Broadleaf Weeds:**

brackenfern	larkspurs	starthistles
buckwheat, wild	geyer	iberian
buffalobur	plains	purple
bursage		yellow
burweed	lambsquarters	St. Johnswort
camelthorn	leafy spurge	sulfur cinquefoil
clover	licorice, wild	sunflower
crupina, common	locoweeds	tansy ragwort
dock	lupines	tasajillo
field bindweed	milkweed	toadflaxes
goldenrod	ox-eye daisy	thistles
henbane, black	pigweed	artichoke
horsenettle	pricklypear cactus	beaumont
Carolina	ragweeds	bull
white	common	Canada
horseweed	bur	distaff
ironweed	lanceleaf	golden
knapweed	western	Italian
diffuse	rush skeletonweed	musk
Russian	Russian thistle	plumeless
spotted	snakeweeds	Scotch
squarrose	sowthistle	wavy leaf

**Mixing and Application Methods**

Mix the required amount of Tordon 22K in water and apply as a coarse, low pressure spray using ground equipment or aircraft. Use enough spray volume to provide uniform coverage of the weeds. For best results treat when the weeds are growing actively in the spring before full bloom or late summer into fall. Treatments during full bloom or seed stage of some weeds may not give good control.

**To prepare the spray**, add about half the desired amount of water in the spray tank. Then with agitation, add the recommended amount of Tordon 22K and other registered tank mix herbicides. Finally, with continued agitation, add the rest of the water and additives such as surfactants or drift control and deposition aids.

**Use With Surfactants**

Addition of wetting or penetration agents is not usually necessary when using Tordon 22K. Under extreme conditions, such as drought, addition of a surfactant may improve efficacy. However, if foliar burn occurs too rapidly, translocation of Tordon 22K will not occur and control of perennial weeds, such as field bindweed, may be reduced.

**Use With Sprayable Liquid Fertilizer Solutions**

Tordon 22K is compatible with most non-pressurized liquid fertilizer solutions; however, if these solutions are to be sprayed with Tordon 22K, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer or pesticide is used, when water sources change, or when tank mixture ingredients or concentrations are changed. Compatibility may be determined by mixing the spray components in the desired order and proportions in a clear glass jar before large scale mixing of spray components in the spray tank. Use of a compatibility aid such as Unite or Compex may help obtain and maintain a uniform spray solution during mixing and application. Agitation in the spray tank must be vigorous to be comparable with jar test agitation. For best results, liquid fertilizer rates should not exceed 50% of the total spray volume. Premix Tordon 22K with water and add to the liquid fertilizer/water mixture while agitating contents of the spray tank. Apply the spray the same day it is prepared while maintaining continuous agitation. Rinse spray tank thoroughly after use.

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



Local conditions may affect the use of herbicides. State agricultural experiment stations or extension service weed specialists in many states issue recommendations to fit local conditions. Be sure that use of this product conforms to all applicable regulations.

**Spot Treatment**

Use application rates as suggested in the "Approved Uses" section of this label or recommended by your area weed control specialist. Apply in a total spray volume of 20 to 100 gallons per acre. Make sure equipment is properly calibrated and that the amount of Tordon 22K added to the spray mixture corresponds to the desired rate and spray volume.

**To Calibrate:**

1. Measure an area 18.5 ft by 18.5 ft in the target application area.
2. Spray the measured area uniformly with **water only** and record the number of seconds required to cover the area.
3. Measure the amount of water delivered to the test area by spraying into a container for this amount of time.
4. The amount of water collected in fl oz equals spray volume in gallons per acre.
5. Refer to the chart below for the amount of Tordon 22K to mix at the spray volume indicated by the calibration procedure. This chart contains the amount of Tordon 22K to mix when the application rate is 1 quart per acre. For a rate of 1/2 quart per acre (1 pint), divide the amount in the table by 2. For an application rate of 2 quarts per acre, multiply the table value by 2.

To Apply the Equivalent of 1 Quart of Tordon 22K per Acre at the Spray Volume Indicated, Mix the Following:

Spray Volume (gallons per acre)	Amount of Tordon 22K per 1 gallon of water	Amount of Tordon 22K per 100 gallons of water
20	10 tsp	5 quarts
40	4 3/4 tsp	2 quarts
60	3 1/4 tsp	1 2/3 quarts
80	2 1/3 tsp	1 1/4 quarts
100	2 tsp	1 quart

Note: tsp = teaspoon  
6 tsp = 1 fluid ounce

**Tank Mixture for Spot or Broadcast Treatment of Susceptible Weeds**

Tordon 22K may also be tank mixed with 2,4-D products or other registered herbicides for use on areas having mixed species including those which respond well to 2,4-D. Read and follow all directions and use precautions on other product labels.

**Wick Application**

Mix 1 part of Tordon 22K with 2 parts of water to prepare a 33% solution. Apply when weeds are actively growing and are above most desirable plants. For ironweed and goldenrod, best results are obtained with applications made prior to early bud stage. Wick applicator should be drained and cleaned after each use. Ropes should be changed when flow is reduced from wear, extended use, poor cleaning or intermittent use.

Approved Uses

**Non-Cropland Areas**

Use Tordon 22K to control susceptible broadleaf weeds and woody plants on non-cropland areas such as on roadsides or other rights-of-way, along fence rows, and around farm buildings. Use up to 2 quarts of Tordon 22K per acre as a broadcast treatment and up to 4 quarts per acre as a spot treatment. Wick Application may be used on non-cropland. See "Wick Application" in "Mixing and Application Methods" section for directions.

**Rangeland and Permanent Grass Pastures**

Use Tordon 22K on rangeland and permanent grass pastures to control susceptible broadleaf weeds and woody plants such as (but not limited to) those shown in the table.

**Grazing Restrictions**

When applying more than 1 quart of Tordon 22K per acre, do not cut grass for feed within two weeks after treatment. Meat animals grazing for up to two weeks after treatment should be removed from treated areas three days prior to slaughter. Do not graze lactating dairy animals on treated areas within two weeks after treatment.

**Broadcast Treatment (Ground and Aerial Applications)**

Tordon 22K can be applied as a broadcast treatment by ground or aurally to control several broadleaf weeds and woody plants. Apply Tordon 22K at the suggested rates in 2 or more gallons of water per acre by air or in 10 or more gallons of water per acre by ground. Re-treat as necessary but do not exceed 1 quart of Tordon 22K per acre per season. For control of actively growing susceptible annual broadleaf weeds, including Russian thistle, apply 1/4 to 1/2 pint per acre of Tordon 22K. Tordon 22K can also be tank mixed with 1/2 to 1 pound per acre 2,4-D where species present are sensitive to 2,4-D.

Tordon 22K at rates over 1 quart may suppress certain established grasses, such as bromegrass, bluegramma, and buffalograss. However, subsequent grass growth should be improved by release from weed competition.

## Weed Control Guidelines for Tordon 22K in Non-cropland, Rangeland and Pasture†

Weed Species††	Rate per Acre	Comments
biennial thistles bull musk plumeless Scotch	Fall: 1/2 pt Spring: 6 - 8 fl oz with 1.0 lb ae 2,4-D	Apply when thistles are in the rosette stage before bolting in the spring or in the fall prior to soil freeze up.
bolted musk thistle	1/2 - 1 pt + 1 lb ae 2,4-D per acre	Apply before flowering.
broom snakeweed geyer larkspur locoweeds multiflora rose plains larkspur prickly pear cactus sulfur cinquefoil	1 pt	For pricklypear cactus, use of a diesel oil-water emulsion spray mixture may improve control.
black henbane crupina diffuse knapweed spotted knapweed yellow starthistle	1 - 2 pt	
absinth wormwood bursage Douglas rabbitbrush goldenrod ox-eye daisy	1 - 2 pt	Tank mix the lower rate with 1.0 lb ae per acre 2,4-D.  Lower rates may require annual spot treatments.
wild licorice	1 qt	
Canada thistle field bindweed gorse lupines rush skeletonweed St. Johnswort tansy ragwort	1 - 2 qt	Tank mix the lower rate with 1.0 lb ae per acre 2,4-D.  Lower rates may require annual spot treatments.
dalmation toadflax juniper perennial sowthistle Russian knapweed yellow toadflax	2 qt.	For Russian knapweed, apply at bud stage or in the fall.  For yellow toadflax, a retreatment program will be required for effective control.
leafy spurge	1 - 2 qt.	Lower rates will require annual retreatment for several years. Re-treat when control drops below 80%.

†For additional species or more specific rates consult your area's current Weed Control Guide and/or your local Dow AgroSciences representative.

††Many seedling annual weeds can be controlled using 1 pt per acre.

### Spot Treatment

See "Spot Treatment" in "Mixing and Application Methods" section for directions for calibration, spray volume determination and mixing.

**Spot Concentrate Application**

Eastern red cedar can be controlled with spot concentrate applications of Tordon 22K in either the spring (April-May) or fall (September-October). For best results, use 3 ml to 4 ml of Tordon 22K (**undiluted**) per 3 feet of plant height. Application should precede periods of expected rainfall. Apply directly to soil within the dripline and on the upslope side of the tree. Application to trees taller than 15 feet is not recommended. Do not use more than 2 pints of Tordon 22K per acre in any one year.

**Wick Application**

See "Wick Application" in "Mixing and Application Methods" section for directions. Apply when weeds are actively growing and are above most desirable plants. For ironweed and goldenrod, best results are obtained with applications made prior to early bud stage.

**Barley, Oats, and Wheat Not Underseeded With a Legume (Which is Not Flood or Sub-Irrigated and Not Rotated to Broadleaf Crops)**

Use Tordon 22K for the control of susceptible annual broadleaf weeds such as (but not limited to) volunteer sunflower, wild buckwheat, lambsquarters, pigweed, Russian thistle, and sowthistle.

**Special Use Precautions**

Do not apply Tordon 22K within 50 days before harvest.

Spray mixtures may cause shorter straw on some varieties of cereals but grain yields are usually not affected.

Do not graze or feed forage from treated areas for 2 weeks after treatment. Do not harvest hay from treated grain fields.

Use only on land that will be planted the following year to grass, barley, oats, wheat or fallowed. Do not apply more than 1 1/2 fluid ounces of Tordon 22K per acre during the small grain growing season.

**Broadcast Treatment (Ground and Aerial Applications)**

Tordon 22K can be applied as a single broadcast treatment by ground or aerially to control several broadleaf weeds by itself or as a tank mix with 2,4-D, MCPA, or sulfonyleurea herbicides such as Ally. Apply Tordon 22K at the rates suggested in the following table in 2 to 5 gallons of water per acre by air or in 5 to 20 gallons of water per acre by ground. The addition of surfactants may aid control under dry conditions, but may cause injury to grain if used over the top. Read and follow directions and precautions on other product labels when tank mixing.

**Spring Wheat, Barley and Oats**

Apply from the 3 to 5 leaf stage to the early jointing stage of growth as indicated in the table below. Applications at the 3 to 5 leaf stage occasionally cause slight head malformations and straw shortening but normally do not affect yield.

**Durum Wheat**

Do not treat durum wheat since some varieties of durum wheat may be injured.

**Winter Wheat and Barley**

Apply after resumption of active growth in the spring until the early jointing stage.

Use only on land that will be planted the following year to grass, barley, oats, wheat, grain sorghum (milo) or fallowed. Do not plant grain sorghum within 8 months after application. This product is not intended for use on land planted to sweet sorghum.

**Use Rates for Wheat, Barley and Oats†**

Weeds	Weed Growth Stage††	Grain Growth Stage	Amounts of Each Product Per Acre†††		
			Tordon 22K	4 lb ae/gal 2,4-D or MCPA	6 lb ae/gal 2,4-D or MCPA
More susceptible species, such as: lambquarters pennycress wild mustard mayweed	3 inches	3 to 5 leaf to early tillering	1 fl oz	1/2 pint	1/3 pint
	3 to 6 inches	Tillering to early jointing	1 1/2 fl oz	3/4 pint	1/2 pint
Less susceptible species such as: volunteer sunflower wild buckwheat Russian thistle pigweed Canada thistle, top growth suppression	1 to 6 inches	Tillering to early jointing	1 1/2 fl oz	3/4 to 1 pint	1/2 to 2/3 pint

†For oats, do not tank mix with 2,4-D herbicides.

††For best results, treat when weeds have 2 to 4 leaves and are actively growing.

†††When measuring small amounts of Tordon 22K, special care should be taken not to exceed suggested rates.

**Fallow Cropland (Not Rotated to Broadleaf Crops)**

Apply Tordon 22K as a post harvest or fallow treatment in continuous grain or during the fallow period. Tordon 22K may be applied alone or in tank mix combination with 2,4-D or other herbicides registered for this use. Apply in 2 or more gallons of water per acre by air or 5 or more gallons per acre by ground. Spray only under conditions that will prevent injury to nearby susceptible crops or ornamentals. Refer to "General Use Precautions" section for information on preventing drift to off-target areas.

**Application Rates**

**Note:** Do not apply more than 1 pint per acre as a broadcast treatment in any calendar year.

**Annual Weeds:** To control annual weeds such as Russian thistle and wild buckwheat, apply 1/4 to 1/2 pint per acre of Tordon 22K in tank mix combination with 1/2 to 1 lb ae of 2,4-D or other herbicides registered for use on fallow land. Apply when weeds are actively growing.

**Field Bindweed:** Apply 1/2 to 1 pint per acre of Tordon 22K plus 1/2 to 1 lb ae per acre of 2,4-D when bindweed is actively growing. Optimum time for treatment is when plant runners reach 8 to 12 inches. Use 1/2 pint per acre to control light to moderate infestations under good growing conditions or to reduce the potential for crop injury. Use higher rates for heavy infestations and longer term control. Some regrowth will occur the following season and a re-treatment program for successive years is recommended.

**Canada thistle:** Apply 1 pint per acre of Tordon 22K plus 1 lb ae per acre of 2,4-D when the majority of thistle plants are emerged but prior to bud stage.

**Crop Rotation**

Use only on land to be planted the following year to grass, barley, oats, wheat, grain sorghum (milo) or fallowed. Do not plant grain sorghum within 8 months after application. This product is not intended for use on land planted to sweet sorghum. Many broadleaf crops are extremely sensitive to soil residues of Tordon 22K. Do not plant sensitive broadleaf crops for 36 months after treatment or until soil residues have declined to a safe level as indicated by an adequately sensitive bioassay using the intended broadleaf crop. A bioassay is recommended following treatment prior to planting any sensitive broadleaf crop.

**Preplant Interval**

A preplant interval following Tordon 22K application prior to planting small grains is recommended to reduce or eliminate potential crop injury and/or yield reduction. The possibility for crop injury or yield reduction to occur depends on application rate, soil organic matter, rainfall, temperature and incidence of cereal diseases. Adequate soil moisture and soil temperature during the preplant interval is important in reducing, but may not eliminate, the risk of crop injury. When considering use of Tordon 22K on fallow land, growers should consider the benefit of weed control against the risk of crop damage and treat only if the risk of injury to small grains can be tolerated. The following preplant intervals are recommended:

**For applications up to 1/2 pint per acre, allow a minimum of 45 days** of soil temperatures above 40°F between application and planting.

**For applications of greater than 1/2 pint and up to 1 pint per acre, allow a minimum of 60 days** of soil temperatures above 40°F between application and planting, except in the states of Idaho, North Dakota, Nebraska, Montana, Oregon, South Dakota, Washington and Wyoming, where the minimum preplant interval is **90 days**.

**Spot Treatment**

See "Spot Treatment" in "Mixing and Application Methods" section for directions for calibration, spray volume determination and mixing.

Spot treatments of Tordon 22K at rates over 1 pint per acre can be made on fallow, non-irrigated cropland if the treated areas comprise less than 10% of the immediate field in any one year. Tordon 22K should not be applied to cropland at rates exceeding 2 quarts per acre. When Tordon 22K at rates above 1 pint per acre are applied, injury to small grains may result for periods up to two years after treatment.

**Conservation Reserve Program (CRP) for Seeding to Permanent Grasses Only**

**Do not use Tordon 22K if legumes are a desired cover during CRP.**

Conditions that stress grasses, such as drought, will increase potential for injury to the grass at all stages of growth. Do not rotate to grain sorghum (milo) if greater than 1 pint per acre of Tordon 22K has been applied. Do not plant grain sorghum within 8 months after application. This product is not intended for use on land planted to sweet sorghum.

**To reduce potential damage to subsequent small grain crops or grain sorghum (milo),** use the lower rate or discontinue the use of Tordon 22K at least 2 years prior to the seeding of small grain crops. After CRP, do not plant broadleaf crops in treated acres until an adequately sensitive bioassay shows that no detectable picloram is present in the soil.

**Broadcast Treatment (Ground and Aerial Applications)**

Applications of Tordon 22K should be made after perennial grasses are well established (have developed a good secondary root system and show good vigor). Most perennial grasses show improved tolerance to the herbicide at this stage of development.

For control of actively growing perennial weeds, use up to 1 quart per acre of Tordon 22K after the grass is established. For best results, use in 2 or more gallons of water per acre by air or in 5 or more gallons of water per acre by ground. Increasing the rate of application can increase the risk of injury.

For control of actively growing susceptible annual broadleaf weeds, (including Russian thistle) apply 1/4 to 1/2 pint per acre of Tordon 22K. Tordon 22K can also be tank mixed with 1/2 to 1 pound per acre of 2,4-D where 2,4-D sensitive species present. Read and follow all directions for use and use precautions on other product labels.

### **Spot Treatment**

See "Spot Treatment" in "Mixing and Application Methods" section for directions for calibration, spray volume determination and mixing.

For spot applications when perennial grasses are established, use 1 to 4 pints per acre of Tordon 22K. Rates of 1 quart per acre should only be used for control of deep-rooted perennial broadleaf weeds.

Tordon 22K at rates over 2 pints per acre may suppress certain established grasses such as bromegrass, bluegramma and buffalograss. However, subsequent grass growth should be improved by release from weed competition.

### **Wick Application**

See "Wick Application" in "Mixing and Application Methods" section for directions. Apply when weeds are actively growing and are above most desirable plants. For ironweed and goldenrod, best results are obtained with applications made prior to early bud stage.

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### **Warranty Disclaimer**

Dow AgroSciences 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. Dow AgroSciences MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

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### **Inherent Risks of Use**

It is impossible to eliminate all risks associated with use of this product. Crop 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 temperatures, 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 Dow AgroSciences or the seller. All such risks shall be assumed by buyer.

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**Limitation of Remedies**

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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 Dow AgroSciences' 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.

Dow AgroSciences shall not be liable for losses or damages resulting from handling or use of this product unless Dow AgroSciences is promptly notified of such loss or damage in writing. In no case shall Dow AgroSciences 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 Dow AgroSciences 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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EPA Accepted:   /  /



# Tordon\* 22K

EPA Reg. No. 62719-6

## Registration Notes:

Current label text based on EPA accepted copy dated March 16, 1998.

Proposed Label Changes by Amendment

1. Label changes to support rotation to sorghum added to the following sections: Barley, Oats, and Wheat Not Underseeded With a Legume; Fallow Cropland; Conservation Reserve Program.

[Editor's note: added text underlined, deleted text denoted by strike-through.]  
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