

62719-17

3/31/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 31 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

John J. Jachetta, Ph.D.
Regulatory Leader
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Dear Dr. Jachetta:

Subject: Tordon® K
EPA Registration No. 62719-17
Application and Letter Dated February 24, 2009,
Request to Amend Registration by Deleting Labeling
Requirement That Reads: "Ever 2 years starting
January 1, 2008, the registrant will offer training to
applicators which will cover application techniques and
product stewardship particular to their use(s) of this
product Tordon K, EPA Registration No. 62719-017).
Applicators of this product must be able to provide
certification of such training on demand to the State,
Tribal or Federal enforcement agent"; and Removal
Reference to Company's Website

The subject proposed labeling amendments to the subject
registration of Tordon® K have been reviewed and found acceptable
under the Federal Insecticide, Fungicide and Rodenticide Act,
as amended, provided that you:

Submit one (1) copy of the final printed labeling before
you release this product for shipment under the subject
labeling.

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

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

Sincerely yours,

Joanne I. Miller

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

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(Base label):

<p>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.</p>

Tordon® K Specialty Herbicide

For control of annual and perennial broadleaf weeds, woody plants, and vines on forest planting sites and non-crop areas including industrial manufacturing sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, and wildlife openings in forest and non-crop areas

Not for sale, distribution or use in Nassau and Suffolk Counties in New York State

Active Ingredient:

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

Acid Equivalent:

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

ACCEPTED

MAR 31 2009

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

62719-17

Keep Out of Reach of Children

CAUTION

Precautionary Statements

Hazards to Humans and Domestic Animals

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
- Chemical-resistant gloves (> 14 mils) such as butyl, natural rubber, neoprene or nitrile rubber
- 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 exist, 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/PPE 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: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

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 runoff 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.

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.

Nonrefillable containers 5 gallons or less:

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Storage and Disposal

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

Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

Pesticide Disposal: Pesticide, spray mixture, or rinsate that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers larger than 5 gallons:**Storage and Disposal**

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

Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

Pesticide Disposal: Pesticide, spray mixture, or rinsate that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

Container Reuse: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transporting. If the container cannot be refilled, follow cleaning instructions for nonrefillable containers.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refer to label booklet for Directions for Use.

Notice: Read the entire label. Use only according to label directions. **Before using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

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

EPA Reg. No. 62719-17

EPA Est. _____

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Contents _____

(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.

Tordon® K

Specialty Herbicide

For control of annual and perennial broadleaf weeds, woody plants, and vines on forest planting sites and non-crop areas including industrial manufacturing sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, and wildlife openings in forest and non-crop areas

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Keep Out of Reach of Children
CAUTION

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 using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies at end of label booklet. If terms are unacceptable, return at once unopened.**

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EPA Reg. No. 62719-17

EPA Est. _____

Produced for
Dow AgroSciences LLC
 9330 Zionsville Road
 Indianapolis, IN 46268

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Net Contents _____

(Page 1 through end):

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION

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Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves (> 14 mils) such as butyl, natural rubber, neoprene or nitrile rubber
- 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 exist, 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.

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Users should:

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

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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 runoff 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.

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.

This product is not intended for manufacturing or formulating.

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

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/ 18**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, fertilizer or feed by storage or disposal. Open dumping is prohibited.

Pesticide Storage: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

Pesticide Disposal: Pesticide, spray mixture, or rinsate that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

Nonrefillable containers 5 gallons or less:

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Refillable containers larger than 5 gallons:

Container Reuse: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Prior to refilling, inspect carefully for damage such as cracks, punctures, abrasions, worn-out threads and closure devices. Check for leaks after refilling and before transporting. If the container cannot be refilled, follow cleaning instructions for nonrefillable containers.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Nonrefillable containers larger than 5 gallons:

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available.

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upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

General Information

Tordon® K herbicide is recommended for control of unwanted susceptible annual and perennial broadleaf weeds, woody plants, and vines on forest planting sites and non-crop areas including industrial manufacturing sites, rights-of-way such as electrical power lines, communication lines, pipelines, roadsides, railroads, and wildlife openings in forest and non-crop areas.

General Use Precautions

Not for sale, distribution or use in Nassau and Suffolk Counties in New York State

Use this product only as specified on this label.

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 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 K 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.

Do not apply this product through a mist blower.

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

Observe any special use and application restrictions and limitations, including method of application and permissible areas of use as promulgated by state authorities.

Maximum Use Rates:

Non-cropland Areas: Total use of Tordon K, including retreatments or spot treatments, must not exceed 1.0 lb a.i. picloram (2 quarts) per acre per annual growing season on rights-of-way and other non-crop areas.

On forest sites, no more than 1.0 lb a.i. picloram (2 quarts) per acre may be applied within a period of 2 annual growing seasons.

Rangeland and Permanent Grass Pastures: For control of noxious or invasive weeds as defined by federal, state, or local authorities, do not apply more than 1.0 lb active ingredient (2 quarts of Tordon K)

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per acre per annual growing season as a broadcast treatment. Spot treatments may be applied at the equivalent broadcast rate of up to 1.0 lb active ingredient (2 quarts) per acre.

For control of other broadleaf weeds and woody plants, do not apply more than 0.5 lb active ingredient (1 quart of Tordon K) per acre per annual growing season. Spot treatments may be applied at an equivalent broadcast rate of up to 1.0 lb active ingredient (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.

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

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 runoff 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 K or sprays containing Tordon K to contact crops or other desirable broadleaf plants, including but not limited to alfalfa, 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 K may 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 K within the root zone of desirable trees unless such injury can be tolerated.

Conifer planting intervals vary. Pines planted sooner than six months after treatment with Tordon K 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 between 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 Northeastern U.S.

Precautions for Avoiding Spray Drift

- Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors.
- Determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.
- Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.
- Apply only when the wind speed is 2-10 mph at the application site.

Additional requirements for aerial applications:

- The boom length must not exceed 75% of the wingspan or 90% of the rotor blade diameter.
- Do not release spray at a height greater than 10 feet above the crop canopy
- Do not make applications into temperature inversions

Additional requirements for ground boom application:

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

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

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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 through a Micro-Foil 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 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 Micro-foil boom, or other systems that cannot accommodate thick sprays.

Ground Equipment: 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; by using large droplet-producing nozzle tips; 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 can be reduced by using spray pressures no greater than are required to obtain adequate plant coverage and spraying no higher than brush tops. Avoid excessive pressures that result in formation of fine spray mists. Nalco-Trol thickening agent or equivalent may be used to reduce spray drift.

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 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 must 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 downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

Wind: Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature And Humidity: When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions: Applications should not occur during a local, low level temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of the smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

Plants Controlled by Tordon K

Annual and Perennial Broadleaf Weeds:

artichoke thistle	larkspurs
absinth wormwood	leafy spurge
bouncingbet	locoweed
broom snakeweed	lupines
burroweed	milkweeds
bursage	musk thistle
Canada thistle	rush skeletonweed
chicory	Russian thistle

- | | |
|----------------|---------------|
| clover | sowthistle |
| fleabane | starthistles |
| field bindweed | tansy ragwort |
| goldenrod | toadflax |
| horsenettle | wild carrot |
| knapweeds | wild parsnip |

Woody Plants and Vines:

- | | |
|-------------------|----------------|
| aspen | liveoak |
| blackberries | locust |
| buttonbush | maple |
| cactus species | mesquite |
| catclaw acacia | oak |
| cedar | persimmon |
| chaparral species | pine |
| dogwood | poison oak |
| Douglas fir | poplars |
| firs | rabbtbrush |
| fringed sagebrush | salmonberry |
| gorse | sassafras |
| guava | sourwood |
| gums | spruce |
| haw | sumac |
| hemlock | trumpetcreeper |
| hickory | willows |
| java plum | juniper |
| lantana | |

Application

Use Tordon K at rates of 1/4 to 2 quarts per acre to control broadleaf weeds, woody plants, and vines. Tordon K Herbicide may be tank mixed with Garlon® 4 Herbicide, Garlon 3A Herbicide, 2,4-D amines or low-volatile esters, Envert 171 and Weedone 2,4-DP to control mixed plant species. When tank mixing, observe all precautions, directions, and limitations on each product label. In all cases use the amounts specified in enough spray volume to give thorough and uniform coverage of the plants to be controlled.

To Prepare Water-Based Sprays Containing Tordon K

Add the total required amount of water to the spray tank. When using Naico-Trol drift control additive, add at rates specified on its container while using continuous agitation. Next, add the required amount of Tordon K. If a tank mixture of herbicides is to be used, add the required amount of Garlon 4 Herbicide or Garlon 3A Herbicide, 2,4-D 3.8 lb/gal amine or low volatile ester, or Weedone 2,4-DP. 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. Continuous agitation should be maintained while mixing the spray.

Observe all use precautions listed on this label.

High Volume Leaf-Stem Treatment

Use Tordon K at the rate of 1/2 to 4 quarts in enough water to make 100 gallons of spray to control vines and other woody plants. To control additional species, mix 1/2 to 1 quart of Tordon K with 1 to 3 quarts of Garlon 4 Herbicide or 1 to 4 quarts of Garlon 3A Herbicide, or 4 to 8 quarts of 3.8 lb/gal 2,4-D amine or low volatile ester in 100 gallons of spray mixture.

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Apply after the foliage is well developed and in a manner to give thorough spray coverage. Wet all leaves, stems, and root collars. For hard-to-kill species such as hickory and oak, wet the soil around the root collar. The amount of spray mixture per acre will vary with plant size and density; however, total use of Tordon K, including total cumulative use with other picloram-containing products, must not exceed maximum application rates specified on this label.

Spot Treatment of Broadleaf Weeds

Use 1/4 to 4 quarts of Tordon K in 100 gallons of water and spray weed foliage uniformly. In tank mix combinations, use 1/4 to 1 quart Tordon K with 1 to 2 quarts of Garlon 4 Herbicide or 1 to 3 quarts of Garlon 3A Herbicide or with 1 to 2 quarts of 2,4-D 3.8 lb/gal amine or low volatile ester or with 2/3 to 1 1/3 quarts of 5.6 lb/gal 2,4-D low volatile ester. The amount of spray mixture per acre will vary with plant size and density; however, total use of Tordon K, including total cumulative use with other picloram-containing products, must not exceed maximum application rates specified on this label.

Broadcast Ground or Aerial Foliage Treatment

To obtain adequate plant coverage, it is recommended that ground applications of Tordon K 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.

Broadleaf Annual and Perennial Weed and Woody Vine Control

Use Tordon K at rates of 1/4 to 2 quarts per acre. Apply to problem weeds and vines any time after growth begins in the spring before full bloom and late in summer or fall. Rates to control several broadleaf weeds are shown in the table below.

Weed Species	Rates of Tordon K Per Treated Acre
Yellow Starthistle, Scotch Thistle, Musk Thistle, Ox-eye Daisy	1/4 to 1/2 quart
Artichoke Thistle, Diffuse Knapweed, Spotted Knapweed, Henbane, Buffalobur, Lupines, Locoweeds, Broom Snakeweed	1/2 to 1 quart
Pricklypear and Cholla cactus, Burweed, Plains Larkspur	1 to 2 quarts
Canada Thistle, Rush Skeletonweed, Russian Knapweed, Dalmatian Toadflax, White Horsenettle	2 quarts
Tall Larkspur, Leafy Spurge, Field Bindweed, Poison Oak	2 quarts

In tank mix combinations, use 1/4 to 1 quart Tordon K per acre with 1 to 3 quarts of Garlon 4 Herbicide or 1 to 4 quarts of Garlon 3A Herbicide or with 1 to 2 quarts of 3.8 lb/gal 2,4-D amine or low volatile ester or with 2/3 to 1 1/3 quarts of 5.6 lb/gal 2,4-D low volatile ester.

Woody Plant Control

Rates to control several woody plants are shown in the table below.

Plant Species	Rates of Tordon K Per Treated Acre
Rabbitbrush, Mesquite	1/2 to 1 quart
Catclaw Acacia	1 to 2 quarts
Pinyon, Juniper, Chaparral, Gorse, Willows, Poplars, Douglas Fir, Cedars	1 to 2 quarts
Gamble Oak, Liveoak, Poison Oak	2 quarts

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For difficult-to-control woody species such as balsam fir, black or Sitka spruce, gums, hickory, maple, oaks, and sourwood use 2 quarts of Tordon K per acre with 2 to 5 quarts of Garlon 4 Herbicide or 4 to 8 quarts of Garlon 3A Herbicide or with 6 to 8 quarts of 3.8 lb/gal 2,4-D low volatile ester, or with 4 to 5 1/3 quarts of 5.6 lb/gal 2,4-D low volatile ester. To control maple, conifers and root-suckering species such as sassafras, sumac, black locust, persimmon, salmonberry, blackberry and western dewberry, apply a mixture of 1 1/2 to 2 quarts of Tordon K per acre plus 3 to 5 quarts of Garlon 4 Herbicide or 4 to 8 quarts of Garlon 3A Herbicide or plus 4 to 10 quarts of 3.8 lb/gal 2,4-D low volatile ester or Weedone 2,4-DP, or plus 2 2/3 to 6 2/3 quarts of 5.6 lb/gal 2,4-D low volatile ester.

Broadcast Cut Stubble Treatment

To prevent re-sprouting of susceptible woody species after mowing or hand cutting on non-crop areas and rights-of-way, use Tordon K Herbicide at the the maximum allowable rate 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 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.

Invert Emulsions

Tordon K can be applied as an invert emulsion tank mix combination spray with Envert 171 Woody Plant Herbicide or other approved invert agent. Consult label directions for Envert 171 Woody Plant Herbicide or invert agent to determine recommended use.

Use of Tordon K with an invert agent results in a thick invert water-in-oil spray emulsion designed to minimize spray drift. Such an emulsion may be formed in a single tank (Batch Mixing) or flash inverted (Flash Mixing). For specific instructions, see invert agent or Envert 171 label.

Where root-suckering species such as sumac, sassafras, locust and black gum predominate, mix 3 gallons of Envert 171 plus 1 1/2 quarts Tordon K with 9 gallons of water for each acre to be sprayed.

Where harder-to-control species such as red maple, elm or oaks are present, mix 5 to 6 gallons of Envert 171 plus 1 to 2 quarts of Tordon K with 15 to 18 gallons of water for each acre to be sprayed.

Broadcast Treatments for Forest Site Preparation (Not for Conifer Release)

For broadcast applications apply the specified rate of Tordon K 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.

Southern States (Alabama, Arkansas, Delaware, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Virginia): To control susceptible woody plants and broadleaf weeds, apply Tordon K at a rate of 2 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 2 quarts per acre of Tordon K in tank mix combination with 2 to 4 quarts of Garlon 4 herbicide. Where grass control is desired, Tordon K, alone or in combination with Garlon 4 herbicide, may be tank mixed with 1 to 4 quarts per acre of Accord or Roundup herbicides, 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 2 quarts per acre of Tordon K with 3 to 5 quarts per acre of Accord or Roundup herbicides, or 16 to 24 fluid ounces of Arsenal Applicator's Concentrate. 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 K at a rate of 1 to 2 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 1 to 2 quarts per acre of Tordon K in tank mix combination with 1.5 to 3 quarts per acre of Garlon 4 herbicide.

Where grass control is also desired, Tordon K, alone or in tank mix combination with Garlon 4, may be applied with 1 to 3 quarts per acre of Accord or Roundup herbicide, 2 to 4 ounces per acre of Oust, a combination of Accord (or Roundup) plus Oust at the rates listed, or 8 to 16 fluid ounces of Arsenal Applicator's Concentrate. When applying tank mixes, follow the use directions and precautions on each product label.

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