

Merlyn Jones, Ph.D.
DowElanco
9002 Purdue Road, Quad IV
Indianapolis, IN 46268

Dear Dr. Jones:

Subject: TORDON® 101K Forestry Herbicide
EPA Registration No. 62719-31
Application Dated November 30, 1992, Request for
an Alternate Brand Name for Product, with Regional
Labeling Under the New Product Name: Forestry 101 R
Herbicide

The proposed amendments to add an alternate brand name and regional labeling to be used with the new brand name have been reviewed and are acceptable under the Federal Insecticide, Fungicide and Rodenticide Act as amended provided that you:

1. Revise the Environmental Hazards statement on the proposed label to include the following statement:
"Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark".
2. Submit five (5) printed copies of the final printed labeling before releasing the product under the subject alternate brand name for shipment.

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 under the subject alternate brand name constitutes acceptance of these conditions.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H-7505C)

Enclosure

E. Wilson: Diskette #ABC2:12-04-92

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Insert 1.

Specialty Herbicide

~~For controlling unwanted trees via cut surface treatments in forests and other non-cropland areas such as fence rows, roadsides and rights-of-way~~

Active Ingredients:

- picloram: 4-amino-3,5,6-trichloropicolinic acid, triisopropanolamine salt 5.4%
 - 2,4-dichlorophenoxyacetic acid, triisopropanolamine salt 20.9%
 - Inert ingredients 73.7%
- Acid equivalents:**
- picloram - 3.0%
 - 2,4-dichlorophenoxyacetic acid - 11.2%

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EPA Reg. No. 62719-31
EPA Est. 464-MI-1

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

WARNING AVISO:

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

Causes Substantial But Temporary Eye Injury • Harmful If Swallowed, Inhaled Or Absorbed Through Skin

Do not get in eyes or on clothing. Wear goggles, face shield or safety glasses when handling. Avoid contact with skin. When handling this product, wear chemical resistant gloves. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not drink solution. Avoid breathing spray mist.

First Aid

If in eyes: Flush with plenty of water for at least 15 minutes. Get medical attention.

If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. **Contains ethylene glycol.**

If swallowed: Induce vomiting immediately by giving two glasses of water and sticking finger down throat. Do not induce vomiting or give anything by mouth to an unconscious person.

Environmental Hazards

Drift or runoff may adversely affect non-target plants. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters.

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

An 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).

Physical or Chemical Hazards

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

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

In case of an emergency endangering ~~life or property~~ involving this product, call collect 517-636-4400.

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

In EPA Letter Dated:

Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) this product is a pesticide registered under EPA Reg. No. 62719-31

Handwritten note: "made updated" with a checkmark.

Pathway

Forestry Tordon 101R Herbicide

health or the environment

3045

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Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
 Read all Directions for Use carefully before applying.
 Use undiluted only as indicated below.

STORAGE AND DISPOSAL

Do not contaminate water, food, fertilizer or feed by storage or disposal.

Storage: Keep container tightly closed when not in use.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your state pesticide or environmental control agency, or the hazardous waste representative at the nearest EPA regional office for guidance. Rinse application equipment after use, at least three times with water, and dispose of rinse water in a non-cropland area away from water supplies.

Metal Container Disposal: Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Plastic Container Disposal: Do not reuse container. Triple rinse (or equivalent). Puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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

General Information

~~Pathway herbicide is a ready-to-use product that is effective in cut surface applications for killing unwanted trees and preventing undesirable sprouting of cut trees in forest and other non-res areas such as fence rows, roadsides and rights-of-way.~~

General Use Precautions

Use this product only as specified on this label.
 Be sure that use of this product conforms to all applicable regulations.
 Pathway is highly active as a herbicide, is water soluble, can move with surface runoff water, and can remain phytotoxic for a year or more if it gets into the soil.
 Pathway 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 Pathway within the root zone of desirable trees unless such injury can be tolerated.

Do not contaminate cropland, water, or irrigation ditches.
 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 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 apply on or in the vicinity of sensitive crops of desirable broadleaf plants. Small amounts can cause injury to plants.

Do not allow careless application or spray drift. Do not permit any spray or spray drift to contact desirable plants. Use only gravity flow or very low spray pressure.

Do not remove product from original container except to apply as indicated under Use Directions.

Do not store near food, feedstuff, fertilizer, seeds, insecticides, fungicides, or other pesticides.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

Woody Plants Controlled by Pathway

ailanthus	elm	maples
alder	fig	oaks
aspen	green ash	pecan
birch	gum	persimmon
cedar	hawthorn	serviceberry
cherry	hickory	sourwood
dogwood	hornbeam	sweetbay

Approved Uses

Tree Injection Treatment

Use 1 milliliter of undiluted Pathway solution through the bark completely around the tree trunk at intervals of 2 to 3 inches between edges of the injector wounds. Make injections near ground level when using the tree injector or 2 to 4 feet above the ground when using a Hypnatchet Injector or similar device. Treatments can be made in any season. Maples should not be treated during the spring sap flow. With some difficult to control species such as dogwood, hickory, sugar maple, ~~big-leaf maple, tamarac, and some firs~~, application to a continuous cut rather than to spaced cuts may be more uniformly effective.

Frill or Girdle Treatment

Make a single hack girdle or "frill" of overlapping axe cuts through the bark completely around the tree as close to the ground as feasible. Spray or paint the injured surface with undiluted Pathway using enough volume to wet treated areas.

Stump Treatment

Spray or paint the cut surfaces of freshly cut stumps and stubs with undiluted Pathway. The cambium area next to the bark is the most vital area to wet.

Warranty Disclaimer

DowElanco warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. DOWELANCO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil condition, etc.), abnormal conditions (such as excessive rainfall, drought, frosts, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by Buyer.

Forestry Tordon 101R

Forestry Tordon 101R Herbicide
Forestry Tordon 101R
and
Forestry Tordon 101R

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Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at DowElanco's election, one of the following:

- 1. Refund of purchase price paid by buyer or user for product bought, or
- 2. Replacement of amount of product used.

DowElanco shall not be liable for losses or damages resulting from handling or use of this product unless DowElanco is promptly notified of such loss or damage in writing. In no case shall DowElanco be liable for consequential or incidental damages or losses.

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

~~Trademark of DowElanco~~

DowElanco - Indianapolis, IN 46268, U.S.A.

LABEL CODE ~~43-14-002~~ DATE CODE ~~89+~~
REPLACES ~~43-14-001~~

Revisions include:

- ~~1) Changed registration number from 464-610 to 62719-31.~~
- ~~2) Changed warranty statement to reflect transfer to DowElanco.~~

~~Discard previous specimen labels.~~

Revisions:

- 1) New alternate brand label "Forestry Tordon 101R Herbicide" for southern forestry use based on the "Pathway Herbicide" label. All non-southern forestry uses deleted.

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Insert 1.

**For controlling unwanted trees via cut surface treatments
in forests and forest roadsides in southern states**

Insert 2.

Forestry Tordon 101R herbicide is a ready-to-use product that is effective in cut surface applications for killing unwanted trees and preventing undesirable sprouting of cut trees in forest and forest roadside sites in the following southern states: Alabama, Arkansas, Delaware, Florida, Georgia, Louisiana, Maryland, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas and Virginia.

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