

DowElanco
9002 Purdue Road
Indianapolis, IN 46268-1189

pm 23

62719-31

Page 1 of 9

Quad III/2
March 12, 1993



Document Processing Desk (H7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Attention: Dan Kenny (Team 23)
Joanne I. Miller (PM-23)

RE: Tordon* RTU
EPA Registration No. 62719-31
Data Call In of October 30, 1992 and January 15, 1993

Enclosed please find notification labeling per the EPA's Data Call In Dated October 30, 1992 and January 15, 1993 for DowElanco's Tordon RTU (EPA Reg. No. 62719-31).

I, being an authorized representative of DowElanco certify that all containers of Tordon RTU produced by October 23, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products. I further certify that all containers of said product sold or distributed by this company by April 15, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products.

Included in this submission are:

<u>Volume No.</u>	<u>Contents</u>
Volume 1 (Administrative)	Transmittal Document (this letter) EPA Application Form 8570-1 (OPP No. 185533) Copy of EPA Data Call In dated October 30, 1992 and January 14, 1993 Label (2 copies) entitled: Tordon RTU (P1A LC LABELS US 45-52)

If you have any questions or need additional information, please call me at (317)870-7264.

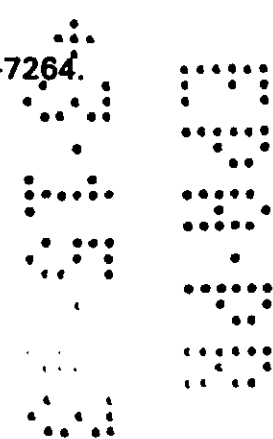
Sincerely,
DowElanco

Larry E. Hammond
Product Registration Manager

LEH:mg
LB:10f

Enclosures

*Trademark of DowElanco



[Front Cover of Label Booklet]

(logo) DowElanco

Tordon* RTU

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 ingredient(s):

picloram: 4-amino-3,5,6-trichloropicolinic acid, trisopropanolamine salt	5.4%
2,4-dichlorophenoxyacetic acid, trisopropanolamine salt†	20.9%

Inert Ingredients	73.7%
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Acid equivalents:

picloram - 3.0%
2,4-dichlorophenoxyacetic acid - 11.2%

†Isomer Specific by AOAC Method No. 6.275-6.279 (13th Ed.)

Keep Out of Reach of Children

WARNING AVISO:

Refer to inside of label booklet for additional precautionary information and Directions for Use including STORAGE AND DISPOSAL.

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

In case of emergency endangering health or the environment involving this product, call collect 517-836-4400.

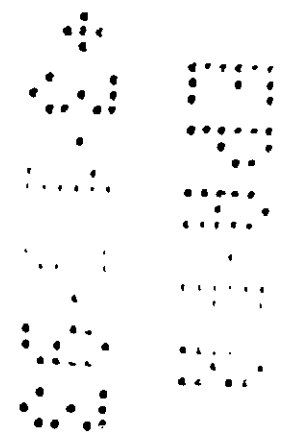
Agricultural Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-31
87244

EPA Est. 464-MI-1
900-001503

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

Specialty Herbicide



[Page 2 through end]

Precautionary Statements

Hazards to Humans and Domestic Animals**WARNING AVISO:**

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. When mixing, loading or applying this product, or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection.

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

After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during previous days application of this product. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

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

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

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, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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

An 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).

BEST AVAILABLE COPY

Physical or Chemical Hazards

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

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.

Worker Protection Requirements

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. Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR parts 156 and 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, restricted-entry interval, and notification to workers. For any requirements specific to your State, consult the agency in your state responsible for pesticide regulation.

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

Tordon RTU 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-crop 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.

Tordon RTU 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.

Tordon RTU 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 RTU within the root zone of desirable trees unless such injury can be tolerated.

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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 run-off to fall onto banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes. Do not apply to snow or frozen ground.

Do not 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 Tordon RTU

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

Approved Uses

Forestry Uses

Agricultural Use Requirements for Forests

Personal Protective Equipment: Applicators or persons repairing or cleaning equipment must wear personal protective equipment specified in the "Precautionary Statements" section of this label.

Restricted Entry Interval: Do not enter or allow agricultural workers on farms (including sod farms) to enter into treated areas during the restricted entry interval (REI) of 24 hours. For early reentry 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, wear eye protection, chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes.

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Non-crop Uses

Use Requirements for Non-cropland Areas

Personal Protective Equipment: Applicators or persons repairing or cleaning equipment must wear personal protective equipment specified in the "Precautionary Statements" section of this label.

Restricted Entry Interval: Do not enter into treated areas until sprays have dried. For early reentry to treated areas, wear eye protection, chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes.

Application Methods

Tree Injection Treatment: Use 1 milliliter of undiluted Tordon RTU 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 Hypohatchet 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, bigleaf maple, tanoak, 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 Tordon RTU, using enough volume to wet treated areas.

Stump Treatment: Spray or paint the cut surfaces of freshly cut stumps and stubs with undiluted Tordon RTU. 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 conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by Buyer.

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Limitation of Remedies

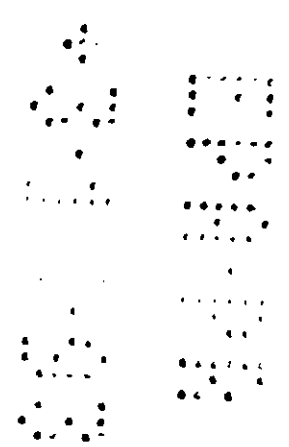
The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at DowElanco's election, one of the following:

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.

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[Base Label of Datapack -- Confront]

(logo) DowElanco

Tordon* RTU

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Active Ingredient(s):

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Inert Ingredients	73.7%
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Acid equivalents:

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†isomer Specific by AOAC Method No. 6.275-6.279 (13th Ed.)

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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, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. See additional Environmental Hazards under Precautionary Statements inside label booklet.

Physical or Chemical Hazards

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

Refer to attached label booklet for additional precautionary information and Directions for Use including STORAGE AND DISPOSAL.

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EPA Reg. No. 62719-31
87244

EPA Est. 464-MI-1
900-001503

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Specialty Herbicide**Label Revisions:**

- 1) Added requirements of the Worker Protection Standard.
- 2) Reformatted label to be compatible with requirements of the Worker Protection Standard.
- 3) Added requirements to comply with the 2,4-D Exposure Reduction Program.

