

PM 23 62719-31

10/22

JUL 21 1995

Mr. Douglas M. Roby
 DowElanco
 9330 Zionsville Rd.
 Indianapolis, IN 46268-1054

Dear Mr. Roby:

SUBJECT: Label Amendment
 DowElanco Tordon RTU/Pathway
 EPA Registration No. 62719-31
 Your Application Dated June 30, 1995, to Revise the
 Engineering Controls Statements; Physical and
 Chemical Hazards Text; and General Use
 Precautions.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided that you:

1. Add the following statement at the end of the Engineering Controls Statements:

"If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS."

I understand that this statement was inadvertently removed from the label and that you have no objections to reinstating it. I also understand that the statement which followed this one on the accepted WPS label and began "When handlers use enclosed cabs or aircraft in a manner..." has been intentionally deleted due to its inapplicability. Since the subject product is only for use in cut surface applications to trees, EPA agrees that the statement regarding enclosed cabs and aircraft has no relevance and may be deleted.

RD:STANTON:PM Team 23:Rm. 235:305-5218:Disk #1:S490069.LET

CONCURRENCES

CONCURRENCES							
SYMBOL ▶	7505C						
SURNAME ▶	S. Stanton						
DATE ▶	Jul 21, 1995						

10/22

Joanne I. Miller

-2-

2. Make the following changes to the First Aid Statements:

-Delete the phrase "if irritation persists" from the dermal exposure statement.

-Revise the oral exposure statement to read as follows:

"If Swallowed: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."

-Add the following inhalation exposure statement:

"If Inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."

Our records indicate that the subject product is in Toxicity Category II for eye irritation, III for acute dermal and inhalation toxicity, and IV for acute oral toxicity and skin irritation potential. The above changes are consistent with the latest guidance for Statements of Practical Treatment for products with this toxicity profile, as discussed in the Agency's Label Review Manual.

3. Submit one final printed copy of the above mentioned label before releasing the product for shipment.

A stamped copy is enclosed for your records.

Sincerely yours,

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

Enclosure

E. J. Hill

Tordon* RTU

62719-31

Proposed label Amendment: Current label text based on EPA-accepted copy dated April 18, 1994, which included revisions required by the 2,4-D Exposure Reduction Program (ERP) and Worker Protection Standard (WPS).

Proposed Amendments:

1. Conflicting language regarding product storage deleted from General Use Precautions section.
2. **Engineering Controls Statements:** For containers of 5 gallons or more: (1) added the statement "Do not open pour product from this container." and (2) added the use of a "spigot" to the already listed "probe and pump" as a means for transferring the contents of the container. These changes were made in accordance with EPA correspondence from Mr. Jack E. Housenger, Chief, Special Review Branch to Mr. Larry Hammond, (DowElanco) Chair, Industry Task Force II for 2,4-D Research Data, dated January 26, 1995.
3. Deleted the word "Combustible" from "Physical and Chemical Hazards" text to make consistent with requirements of 40 CFR Part 156.10 requirements for non-pressurized containers.

Other: Restored the statement "Avoid contact with skin." to Precautionary Statements section. This statement was inadvertently removed from copy accepted by EPA under WPS.

*Trademark of DowElanco

[Editor's note: Deleted text denoted by strike-through.]

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUL 21 1995

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719-31

40/20

(Base label):

(logo) DowElanco

Tordon* RTU

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

Active Ingredient(s):

picloram: 4-amino-3,5,6-trichloropicolinic acid, trisoopropanolamine salt	5.4%
2,4-dichlorophenoxyacetic acid, trisoopropanolamine salt†	20.9%
Inert Ingredients	73.7%
Total	100.0%

Acid equivalents:

picloram -	3.0%
2,4-dichlorophenoxyacetic acid -	11.2%
†Isomer Specific by AOAC Method No. 978.05 (15th Ed.)	

Precautionary Statements**Hazards to Humans and Domestic Animals****Keep Out of Reach of Children****WARNING AVISO**

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

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

Do not get in eyes or on clothing. Avoid contact with skin.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for

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cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Controls Statements

For containers of 5 gallons or more: Do not open pour product from this container. A mechanical transfer system (probe and pump or spigot) 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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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).

Physical or Chemical Hazards

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

Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to 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" in the attached label booklet.

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

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

EPA Reg. No. 62719-31

EPA Est. 464-MI-1

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

Specialty Herbicide

(Datapack cover):

(logo) DowElanco

Tordon* RTU

For controlling unwanted trees via cut surface treatments in forests and 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%

Acid equivalents:

picloram - 3.0%

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Specialty Herbicide

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(Page 1 through end):

Precautionary Statements

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Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Controls Statements

For containers of 5 gallons or more: Do not open pour product from this container. A mechanical transfer system (probe and pump or spigot) 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.

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.
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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.

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.

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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.

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 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

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

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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.

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.

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~~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	hombear	sweetbay

Approved Uses

Forest Uses

Agricultural Use Requirements for Forest Use: For the following crop and forestry uses, follow PPE and Reentry instructions in the "Agricultural Use Requirements" section of this label.

Non-crop Uses Such As Fence Rows, Roadsides and Rights-of-Way

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

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.

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

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, tomadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal 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

EPA-accepted / /

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Pathway*

EPA Reg. No. 62719-31

Proposed label Amendment: Current label text based on EPA-accepted copy dated April 18, 1994, which included revisions required by the 2,4-D Exposure Reduction Program (ERP) and Worker Protection Standard (WPS).

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ACCEPTED
with COMMENTS
In EPA Letter Dated
11/2/1995

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719-31

14/01/22

(Base label):

(logo) DowElanco

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Active Ingredient(s):

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2,4-dichlorophenoxyacetic acid, trisopropanolamine salt†	20.9%
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Acid equivalents:

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Precautionary Statements

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Specialty Herbicide

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(Datapack cover):

(logo) DowElanco

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WARNING AVISO

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

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" in the attached label booklet.

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

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

EPA Reg. No. 62719-31

EPA Est. 464-MI-1

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Specialty Herbicide

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(Page 1 through end):

Precautionary Statements**Hazards to Humans and Domestic Animals****Keep Out of Reach of Children****WARNING AVISO**

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

Do not get in eyes or on clothing. Avoid contact with skin.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selections chart.

Applicators and other handlers must wear:

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

Engineering Controls Statements

For containers of 5 gallons or more: Do not open pour product from this container. A mechanical transfer system (probe and pump or spigot) 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.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

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.

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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.

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.

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.

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 48 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

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

Storage and Disposal

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

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-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.

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 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.

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~~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	firs	oaks
aspen	green ash	pecan
birch	gum	persimmon
cedar	hawthorn	serviceberry
cherry	hickory	sourwood
dogwood	hombear	sweetbay

Approved Uses

Forest Uses

Agricultural Use Requirements for Forest Use: For the following forestry uses, follow PPE and Reentry instructions in the "Agricultural Use Requirements" section of this label.

Non-crop Uses Such As Fence Rows, Roadsides and Rights-of-Way

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

Application Methods

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 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.

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

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 conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tomadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of DowElanco or the seller. All such risks shall be assumed by buyer.

Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal 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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