



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

MAY 29 2003

Dr. John Jachetta  
Dow AgroSciences  
9330 Zionsville Road  
Indianapolis, IN 46268

Registered Mail ~~R-733198-321~~

RA 647 088 528 US

Subject: Garlon 4  
EPA Registration No. 62719-40  
Supplemental labeling for batch contaminated with 600 ppm picloram  
submitted May 21, 2003

Dear Dr. Jachetta:

The supplemental labeling referred to above is acceptable provided you adhere to the following conditions:

1. Affix this supplemental labeling to the product container for all picloram-contaminated Garlon 4 product. Do not attach the master labeling or other approved labeling for Garlon 4 to the picloram-contaminated Garlon 4 product.
2. This supplemental labeling may only be used with the 15,300 gallon batch of Garlon 4 that contains 0.06% w/w (600 ppm) picloram potassium salt at the DOW Chemical manufacturing facility in Midland Michigan.

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 constitutes acceptance of these conditions.


This labeling supercedes the supplemental labeling for the picloram-contaminated Garlon 4 product stamped May 22, 2003. Effective immediately, the May 22, 2003 label is no longer valid. This labeling

278

expires 365 days after the date of this letter. A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, you may call Tobi Colvin-Snyder at 703-305-7801.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Tompkins", written over the printed name.

Jim Tompkins

Product Manager (25)

Herbicide Branch

Registration Division (7505C)

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# Supplemental Labeling



Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

## Garlon\* 4

EPA Reg. No. 62719-40

**For Control of Woody Plants and Broadleaf Weeds in Rights-of Way, Railroads  
and Southern Flatwoods Pine Stands**

### Active Ingredients:

triclopyr: 3,5,6-trichloro-2-  
pyridinyloxyacetic acid,  
butoxyethyl ester .....61.6%  
picloram: 4-amino-3,5,6-trichloropicolinic acid,  
potassium salt .....0.06%

Inert Ingredients .....38.34%

Total .....100.00%

Contains petroleum distillates

Acid Equivalent:

triclopyr - 44.3% - 4 lb/gal

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAY 29 2003

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

62719-40

**Keep Out of Reach of Children**

## CAUTION PRECAUTION

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.)

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

**Causes Moderate Eye Irritation • Harmful If Swallowed Or Absorbed Through Skin • Prolonged Or  
Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals**

**Avoid contact with eyes, skin, or clothing.**

#### 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 E on an EPA chemical resistance category selections chart.

**WPS Uses: Applicators and other handlers who handle this pesticide for any use covered by the  
Worker Protection Standard (40 CFR Part 170) – for this product, forestry sites – must wear:**

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves (≥ 14 mils) such as barrier laminate, nitrile rubber, neoprene rubber, or viton

**Non-WPS Uses: Applicators and other handlers who handle this pesticide for any use NOT  
covered by the Worker Protection Standard (40 CFR Part 170) – for this product, non-forestry sites  
– must wear:**

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

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the WPS (40 CFR 170.240(d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

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.

### User Safety Recommendations

Users should:

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

### First Aid

**If in eyes:** 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.

**If on skin or clothing:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**If swallowed:** Immediately call a poison control center or doctor. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give **any** liquid to the person. Do not give anything by mouth to an unconscious person.

**Note to Physician:** This product may pose an aspiration pneumonia hazard. Contains petroleum distillates.

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

Picloram 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 cleaning equipment or disposing of equipment washwaters.

Triclopyr has properties and characteristics associated with chemicals detected in groundwater. Picloram is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

Picloram 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.

### Physical or Chemical Hazards

**Do not use or store the product near heat or open flame.**

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### Directions for Use

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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**

The requirements in this box apply to forestry uses.

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
- Shoes plus socks
- Chemical-resistant gloves ( $\geq$  14 mils) such as barrier laminate, nitrile rubber, neoprene rubber, or viton

### **Non-Agricultural Use Requirements**

The requirements in this box apply to all use sites on this label except for forestry uses.

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:** For applications to non-cropland areas, do not allow entry into areas until sprays have dried.

### **Storage and Disposal**

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

**Storage:** Store above 28°F or agitate before use.

**Pesticide Disposal:** Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable federal, state, or local procedures.

**Plastic Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or 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.

**Metal Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**Container Disposal for Refillable Containers:** Replace the dry disconnect cap, if applicable, and seal all openings which have been opened during use. Return the empty container to a collection site designated by Dow AgroSciences. If the container has been damaged and cannot be returned according to the recommended procedures, contact the Dow AgroSciences Customer Service Center at 1-800-258-1470 to obtain proper handling instructions.

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

### **General Use Precautions and Restrictions**

**In Arizona:** The state of Arizona has not approved Garlon 4 for use on plants grown for commercial production; specifically forests grown for commercial timber production, or on designated grazing areas.

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

**Other Precautions:**

- When applying this product in tank mix combination, follow all applicable use directions and precautions on each manufacturer's label.
- Do not apply on ditches used to transport irrigation water. Do not apply where runoff or irrigation water may flow onto agricultural land as injury to crops may result.
- Do not apply this product using mist blowers unless a drift control additive, high viscosity inverting system, or equivalent is used to control spray drift.
- Sprays applied directly to Christmas trees may result in conifer injury.
- Do not apply Garlon 4 directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers, or other desirable broadleaf plants and do not permit spray mists containing it to drift onto them.
- It is permissible to treat non-irrigation ditch banks, seasonally dry wetlands, flood plains, deltas, marshes, swamps, bogs, and transitional areas between upland and lowland sites. Do not apply to open water such as lakes, reservoirs, rivers, streams, creeks, salt water bays, or estuaries.

### **Grazing and Haying Restrictions**

Except for lactating dairy animals, there are no grazing restrictions following application of this product.

**Grazing Lactating Dairy Animals:** Do not allow lactating dairy animals to graze treated areas until the next growing season following application of this product.

Do not harvest hay for 14 days after application.

Grazed areas of non-cropland and forestry sites may be spot treated if they comprise no more than 10% of the total grazable area.

**Slaughter Restrictions:** During the season of application, withdraw livestock from grazing treated grass at least 3 days before slaughter.

### **Avoid Injurious Spray Drift**

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 of hazardous spray drift, do not spray.

**Ground Equipment:** To aid in reducing spray drift potential when making ground applications near susceptible crops or other desirable broadleaf plants, Garlon 4 should be applied through large droplet producing equipment, such as the Radiarc sprayer or in thickened spray mixtures using an agriculturally registered drift control additive, or high viscosity invert systems. When using a spray thickening or inverting additive, follow all use directions and precautions on the product label. 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; and by spraying when wind velocity is low. Do not apply with nozzles that produce a fine droplet spray. Keep operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used. Low pressure nozzles are available from spray equipment manufacturers. Select nozzles and pressures which provide adequate plant coverage, but minimize the production of fine spray particles.

## **Plants Controlled by Garlon 4**

### **Woody Plants Controlled**

alder	chinquapin	madrone	scotch broom
arrowwood	choke cherry	maples	sumac
ash	cottonwood	mulberry	sweetbay magnolia
aspen	Crataegus (hawthorn)	oaks	sweetgum
bear clover (bearmat)	dogwood	persimmon	sycamore
beech	Douglas-fir	pine	tanoak
birch	elderberry	poison ivy	thimbleberry

blackberry	elm	poison oak	tree-of-heaven
blackgum	gallberry	poplar	( <i>Ailanthus</i> ) <sup>†</sup>
boxelder <sup>†</sup>	gorse	salmonberry	tulip poplar
Brazilian pepper	hazel	salt-bush	wax myrtle
buckthorn	hickory	( <i>Braccharis</i> spp.)	wild rose
cascara	hornbeam	salt-cedar <sup>†</sup>	willow
Ceanothus	kudzu <sup>††</sup>	sassafras	winged elm
cherry	locust		

<sup>†</sup>For best control, use either a basal bark or cut stump treatment.

<sup>††</sup>For complete control, retreatment may be necessary.

#### Annual and Perennial Broadleaf Weeds Controlled

black medic	curly dock	matchweed	sweet clover
bull thistle	dandelion	mustard	vetch
burdock	field bindweed	Oxalis	wild carrot
Canada thistle	goldenrod	plantain	(Queen Anne's lace)
chicory	ground ivy	purple loosestrife	wild lettuce
clover	lambquarters	ragweed	wild violet
creeping beggarweed	lespedeza	smartweed	yarrow

### High Volume Foliar Treatment (Ground Equipment Only)

Garlon 4 is recommended for the control of woody plants and annual and perennial broadleaf weeds in rights-of-way, railroads, and southern flatwoods pine stands.

For control of woody plants, use Garlon 4 at the rate of 1 to 3 quarts per 100 gallons of spray mixture, or Garlon 4 at 1 to 3 quarts may be tank mixed with labeled rates of 2,4-D low volatile ester herbicide, Tordon\* 101 Mixture herbicide, or Tordon K herbicide, and diluted to make 100 gallons of spray. Apply at a volume of 100 to 400 gallons of total spray per acre depending on size and density of woody plants. Coverage should be thorough to wet all leaves, stems, and root collars. See Table 1 for relationship between spray volume and maximum application rate. When tank mixing, follow applicable use directions and precautions on each manufacturer's label.

**Table 1 (Maximum Application Rate):** The following table is provided as a guide to the user to achieve the proper rate of Garlon 4 without exceeding the maximum use rate of 8 quarts per acre:

Spray Volume Per Acre	Quarts of Garlon 4 Per 100 Gallons of Spray (Not to Exceed 8 qt/acre)
400	2
300	2.7
200	4
100	8
50	16
20	40
10	80

#### Broadcast Applications for Rights-of-Way and Railroads

To control susceptible woody plants and broadleaf weeds, apply Garlon 4 at a rate of 4 to 8 quarts per acre. To broaden the spectrum of woody plants and broadleaf weeds controlled, apply 2 to 4 quarts per acre of Garlon 4 in tank mix combination with labeled rates of Tordon 101 Mixture or Tordon K. Tordon 101 Mixture and Tordon K are not registered for use in the states of California and Florida. Where grass control is also desired, Garlon 4, alone or in combination with Tordon K or Tordon 101 Mixture, may be tank mixed with labeled rates of Accord, Roundup, or Arsenal Applicator's Concentrate herbicides. Use of tank mix products must be in accordance with the most restrictive of label limitations and precautions. No label application rates should be exceeded. Garlon 4 cannot be tank mixed with any product containing a label prohibition against such mixing.

**Broadcast Applications for Mid-Rotation Understory Brush Control in Southern Flatwoods Pine Stands**

For control of susceptible species such as gallberry and wax-myrtle and broadleaf weeds, apply 2 to 4 quarts per acre of Garlon 4. To broaden the spectrum of woody plants controlled to include fetterbush, staggerbush, and titi, apply 2 to 3 quarts per acre of Garlon 4 in tank mix combination with labeled rates of Arsenal Applicator's Concentrate. Saw-palmetto will be partially controlled by use of Garlon 4 at 4 quarts per acre or by mixtures of Garlon 4 at 2 to 3 quarts per acre in tank mix combination with either Arsenal Applicator's Concentrate or Escort herbicide.

These mixtures should be broadcast applied over target understory brush species, **but to prevent injury to pines, make applications underneath the foliage of pines.** It is recommended that sprays be applied in 30 or more gallons per acre of total volume. For best results, make applications in late summer or fall. Efficacy may not be satisfactory when applications are made in early season prior to August.

\*Trademark of Dow AgroSciences LLC

L1A / Garlon 4 / Prop Sec 3 Suppl Railroads-Southern Flatwoods / 05-20-03

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Initial printing.