

62719-67

12-15-2000

1/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 15 2000

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

J. Robert Peterson PhD.
Dow AgroSciences
9330 Zionsville Road
Indianapolis, IN 46268-1054

Dear Dr. Peterson:

Subject: Triclopyr RED Submission and Revised Label
Turflon D
EPA Registration No. 62719-67
Your Submission Dated December 11, 2000

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

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

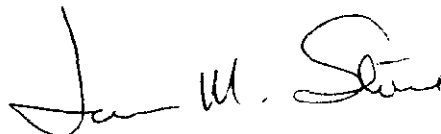
- It is understood that on page 4 on the Label Booklet Cover the duplicate Agricultural Use Requirements referral box replaces the box on the container label that is covered by the booklet.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Please note that this product can not be reregistered under section 4(g)(2)(c) of FIFRA until the 2,4-D RED is issued and all requirements for that active ingredient have been satisfied. It is understood that if EPA requires a groundwater statement to appear on triclopyr product labels that Dow AgroSciences will promptly revised this label as needed.

Sincerely yours,



James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure

3/14

(Base label):

(Logo) Dow AgroSciences LLC

Turflon* D
Low Volatile Weed Killer

ACCEPTED
with COMMENTS
In EPA Letter Dated:

DEC 15 2000

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

~~6277-67~~

For the control of annual and perennial broadleaf weeds in ornamental residential, commercial, and recreational turf and commercial sod.

To be applied only under the direct supervision of commercial applicators responsible for turf weed control programs.

Active Ingredient(s):

2,4-dichlorophenoxyacetic acid, butoxyethyl ester †	34.4%
triclopyr <u>BEE</u> : 3,5,6-trichloro-2- pyridinyloxyacetic acid, butoxyethyl ester	16.5%
Inert Ingredients	49.1%
Total	100.0%

Contains Petroleum Distillates

Acid Equivalents: 2,4-dichlorophenoxyacetic acid - 23.7% - 2 lb/gal
triclopyr - 11.9% - 1 lb/gal

†Isomer Specific by AOAC Method No. 978.05 (15th Ed.)

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

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.)

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

Avoid contact with skin, eyes, 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.

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Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, 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) to transfer the contents of this container must wear coveralls or a Chemical-resistant apron in addition to other required PPE.

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: A mechanical system (such as probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. 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.

When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [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 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

~~In case of contact: Flush skin or eyes with plenty of water. Get medical attention if irritation persists.
If swallowed: Do not induce vomiting. Call a physician or Poison Control Center.~~

If swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Environmental Hazards

This product is toxic to fish. Drift or runoff may adversely affect fish and nontarget plants. Do not apply directly to water, to areas where surface water is present, or to intertidal area below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Physical or Chemical Hazards

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

Growth

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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," "Inherent Risks of Use," and "Limitation of Remedies" inside 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. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

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

EPA Reg. No. 62719-67

EPA Est. 464-MI-1

*Trademark of Dow AgroSciences LLC

Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

Specialty Herbicide

Net Contents XXX

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(Label booklet cover):
(Logo) Dow AgroSciences LLC

Turflon* D

Low Volatile Weed Killer

For the control of annual and perennial broadleaf weeds in ornamental residential, commercial, and recreational turf and commercial sod.

To be applied only under the direct supervision of commercial applicators responsible for turf weed control programs.

Active Ingredient(s):

2,4-dichlorophenoxyacetic acid, butoxyethyl ester †	34.4%
tricypr <u>BEE</u> : 3,5,6-trichloro-2-pyridinyloxyacetic acid, butoxyethyl ester	16.5%
Inert Ingredients	49.1%
Total	100.0%

Contains Petroleum Distillates
Acid Equivalents: 2,4-dichlorophenoxyacetic acid - 23.7% - 2 lb/gal
tricypr - 11.9% - 1 lb/gal

†Isomer Specific by AOAC Method No. 978.05 (15th Ed.)

Keep Out of Reach of Children

CAUTION PRECAUCION

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 inside of label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations 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," "Inherent Risks of Use," and "Limitation of Remedies" inside 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. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

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Specialty Herbicide

Net Contents XXX

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(Page 1 through end):

Precautionary Statements

Hazards to Humans and Domestic Animals

CAUTION PRECAUCION

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

Avoid contact with skin, eyes, 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.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, 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) to transfer the contents of this container must wear coveralls or a Chemical-resistant apron in addition to other required PPE.

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: A mechanical system (such as probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. 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.

When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protections Standard (WPS) for agricultural pesticides [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 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

~~In case of contact: Flush skin or eyes with plenty of water. Get medical attention if irritation persists.
If swallowed: Do not induce vomiting. Call a physician or Poison Control Center.~~

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If swallowed: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Environmental Hazards

This product is toxic to fish. Drift or runoff may adversely affect fish and nontarget plants. Do not apply directly to water, to areas where surface water is present, or to intertidal area below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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.

~~Do not use 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 such as Barrier Laminate, Nitrile Rubber, Neoprene Rubber, or Viton
- Shoes plus socks
- Protective eyewear

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.

Restricted Entry Interval: For use on residential and other turf sites (excluding sod farms and turf grown for seed), ~~do not allow people (other than applicator) or pets on treatment area during application. Do not enter into treated areas until sprays have dried~~ do not enter or allow others to enter the treated area until sprays have dried.

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Storage And Disposal

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

Storage: Store above 10°F or agitate before 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.

Plastic Container Disposal: **Do not reuse container.** 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: **Do not reuse container.** 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.

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

General Information

Foliage sprays should be applied during warm weather when weeds are actively growing. Application under drought conditions may provide less than desirable results. Use low spray pressures to minimize spray drift. **Apply Turflon D herbicide in a manner to avoid contacting nearby susceptible crops or other desirable plants and to avoid contaminating water intended for irrigation or domestic use. Read and follow all Use Precautions given on this label.**

General-Use Precautions and Restrictions

Apply this product only as specified on this label.

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

In Arizona: The state of Arizona has not approved Turflon ~~II Amine D~~ for use on sod farms.

Restrictions on Retreatment: Do not apply more than 2 broadcast applications per year per treatment site on residential, commercial and recreational turf. Do not apply more than 4 broadcast applications per year per treatment site on commercial sod.

For ground application only.

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

Do not apply Turflon D directly to, or otherwise permit it to come into direct contact with cotton, grapes, tobacco, vegetable crops, flowers, fruit or ornamental trees, or other desirable broadleaf plants and do not permit spray mists containing it to drift onto them.

Do not apply to exposed roots of shallow rooted trees or shrubs.

Do not apply more than 2 quarts of Turflon D on any one acre at one time. ~~Do not apply more than 4 quarts of Turflon D per year.~~

Avoid injurious spray drift. Applications should be made only when hazards from spray drift are at a minimum. 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.

2
A
S Swank
2 gal
21L
= 4 lbs 4 oz
OK
SB new
non contact
→ 1-10-00

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With ground broadcast equipment, drift can be reduced by keeping the spray boom as low as possible; by applying no less than 20 gallons of spray per acre; by using no more than 20 pounds spraying pressure with flat fan or flooding flat fan nozzle tips; and by spraying only when wind velocity is low.

In handgun applications, drift can be reduced by using low pressure Teejet flat fan, raindrop, or other drift controlling nozzles. Standard flat fan nozzles may also be used at no more than 20 psi. At this pressure, the spray pattern may be narrower.

At high temperatures, vapors from this product may injure susceptible crops growing nearby. Excessive amounts of this herbicide in the soil may temporarily inhibit seed germination and plant growth.

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.

Weeds Controlled

black medic	henbit
bull thistle (a)	knawel
burdock (a)	lambsquarter
buttercup (a)	lespedeza
Canada thistle (a)	matchweed
catnip	mustards (a)
chamise	oxalis (<i>stricta</i> and <i>corniculata</i>) (b)
chickweeds (common and mouseear)	plantain
chicory	poison ivy
cinquefoil	poison oak
clovers	prostrate spurge (b)
cocklebur	purslane speedwell
cornflower	smartweed
cornspeedwell (b)	sowthistle
creeping beggarweed	spiderwort
dandelion	spotted catsear
docks	vetch
dwarf beggarweed	wild carrot (a)
field bindweed	wild violet (b)
goldenrod	yarrow
ground ivy (b)	

(a), (b) - See "Broadcast Treatment of Ornamental Turf" "Broadcast Treatment of Residential, Commercial, and Recreational Turf and Commercial Sod".

Preparing the Spray

Turflon D in water forms an emulsion (not a solution), and separation may occur unless the spray mixture is agitated continuously. Fill the spray tank about half full with clean water. Then add the Turflon D and complete filling the tank with agitation running. Mix thoroughly and continue moderate agitation while spraying.

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**Approved
Labeled Uses**

Turf**Broadcast Treatment of Residential, Commercial, and Recreational Ornamental-Turf and Commercial Sod**

Apply 1 to 2 quarts of Turflon D in enough water to make 20 to 200 gallons total spray per acre to control broadleaf weeds growing in tall fescue, bluegrass, or perennial ryegrass turf. Do not use on other grass species, such as bentgrass or St. Augustine grass, unless injury can be tolerated. Turflon D at 3 pints per acre (1.1 ounce per 1,000 square feet) will provide control of most weeds listed. The use of 4 pints per acre (1.5 ounces per 1,000 square feet) is suggested for those followed by (a). Optimum control of those species followed by (b) has been obtained when two applications of 3 pints per acre have been made 4 weeks apart. Apply from early spring through early fall when weeds are growing. ~~To control a variety of broadleaf weed species which may germinate at different periods, three or four applications of Turflon D may be needed during a year.~~ Applications should be made 4 weeks apart to minimize grass injury.

Newly seeded turf should be mowed two or three times before being treated. Do not water for 24 hours after application. Do not reseed for 3 weeks after application.

Broadcast Application Restrictions for Residential, Commercial, and Recreational Turf: A maximum of 2 quarts of Turflon D per acre may be applied two times per year.

Broadcast Application Restrictions for Commercial Sod: A maximum of 2 quarts of Turflon D per acre may be applied up to four times a year to control a variety of broadleaf seed species which may germinate at different periods.

Spot Treatment of Residential, Commercial, and Recreational Ornamental-Turf and Commercial Sod Using Portable Sprayers

Mix 1 to 2 fluid ounces of Turflon D in enough water to make 3 gallons of spray (1 to 2 quarts per 100 gallons of spray) and apply at any time broadleaf weeds are susceptible by wetting foliage of undesirable plants to point of runoff.

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

Warranty Disclaimer

Dow AgroSciences 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. Dow AgroSciences 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 Dow AgroSciences 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 Dow AgroSciences' 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.

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

The terms of the "Warranty Disclaimer" and Inherent Risks of Use above and this "Limitation of Remedies" cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Dow AgroSciences 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 Dow AgroSciences LLC
EPA-Accepted: ___/___/___

13/14

Turflon* D

EPA Reg. No. 62719-67

Registration Notes

Current label text based on EPA-accepted "Final Printed Labeling" dated January 9, 1995, Notification coded "R1A/Turflon D/Notif./01-30-96", and Notification coded "R1A / Turflon D / Notif. / 12-18-97.

Proposed Label Changes in Accordance with Triclopyr RED Dated October 1998:

1. **Precautionary Statements:** Revised Precautionary Statements, consistent with acute toxicity categories and EPA Label Review Manual.

Acute Toxicity Category by Route of Exposure

Route of Exposure	Turflon D
Oral LD50	III
Dermal LD50	IV
Dermal Irritation	IV
Ocular Irritation	IV
Inhalation	IV
Dermal Sensitization	sensitizer

2. **Directions for Use:** (1) revised text in Non-Agricultural Use Requirements box.

Additional Changes:

3. Revised format for KOROC statement and signal word on base label in accordance with recent guidance from EPA labeling team. Signal word and KOROC statement need not be repeated within Precautionary statements when entire base label appears in a single label panel.
4. Deleted the word "combustible" from "Physical and Chemical Hazards" in accordance with 40 CFR 156.10 (h)(iii). Also deleted non-essential statement "Do not cut or weld on container".
5. Directions for Use: (1) Revised "General Use Precautions" heading to read "General Use Precautions and Restrictions"; and (2) Deleted the statement "Do not use for manufacturing or formulating."

08Dec00 – Revisions to label in response to letter dated November 2, 2000 from James A. Tompkins, EPA:

1. Hazards to Humans and Domestic Animals: Removed word "Moderate" and deleted "Causes Eye Irritation"; deleted "Avoid contact with eyes or clothing" text since ocular irritation and dermal irritation results are Category IV. Reinstated "Prolonged or Repeated Skin Contact May Cause Allergic Skin Reactions in Some Individuals" statement. (Editor's Note: Also changed Toxicity category for eye irritation to Category IV and Dermal Sensitization to sensitizer in "Acute Toxicity Category by Route of Exposure" table in registration notes.)
2. First Aid: Revised First Aid statements in accordance with PR Notice 2000-3 for "If swallowed" only. Deleted "In case of contact" text since ocular irritation toxicity is Category IV.
3. Deleted the word "General" in the heading "General Use Precautions" and retitled the section to read "Use Precautions and Restrictions". Retitled the section "Approved Uses" to now read "Labeled Uses".
4. Use Precautions and Restrictions: Revised the Arizona State restriction to specify Turflon D as the product brand name.
5. Labeled Uses: Retitled section to "Broadcast Treatment of Residential, Commercial, and Recreational Turf and Commercial Sod" to specify use sites for application of Turflon D.
6. Non-Agricultural Use Requirements: Changed the proposed re-entry text from "do not allow worker entry into areas until sprays have dried, unless applicator and other handler PPE is worn" to "do not enter or allow others to enter the treated area until sprays have dried."

7. Storage and Disposal: Deleted "and may contaminate groundwater" in the Pesticide Disposal section.
8. Use Precautions and Restrictions: Added "For ground application only" text.

Additional Changes:

9. Active Ingredient: Corrected active ingredient to read "triclopyr BEE" (followed by full chemical name) to match current, EPA-approved Confidential Statement of Formula.
10. Referral statements to Warranty Disclaimer, Inherent Risks of Use and Limitation of Remedies were revised per EPA correspondence from Joanne I. Miller dated August 31, 2000 and Dow AgroSciences response to Donald R. Stubbs dated November 20, 2000.
11. Use Precautions and Restrictions: (a) Revised "Restrictions on Retreatment" text to specify retreatment restrictions for residential, commercial and recreational turf as well as commercial sod; and (b) Deleted "Do not apply more than 4 quarts of Turflon D per year" since inconsistent with retreatment restriction text in Directions for Use section.
12. Weeds Controlled: Revised referral statement for footnotes (a), (b) in this section.
13. Labeled Uses: (a) Under "Broadcast Treatment of Residential, Commercial, and Recreational Turf and Commercial Sod" specified retreatment restrictions for residential, commercial and recreational turf as well as commercial sod; and (b) Retitled spot treatment section to read "Spot Treatment of Residential, Commercial, and Recreational Turf and Commercial Sod Using Portable Sprayers".

[Editor's note: Added text is underlined and deleted text is denoted by strike-through.]

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