



62719-67

11/23/2001

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOV 23 2001

J. Robert Peterson, Ph.D.
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Turflon* D
EPA Reg. No. 62719-67
Amendment revising First Aid Statements and Warranty Disclaimer and adding
Terms and Conditions of Use section
OPP ID No. 286753
Your application dated September 17, 2001

Dear Dr. Peterson:

The product labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, provided you make the required changes listed below:

1. Add the following language in **bold typeface** on page 1 (the base label) directly under "Turflon* D Low Volatile Weed Killer"

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

2. On page 1, add the Signal Word "Caution" to the Precautionary Statements section immediately below the subheading "Hazards to Humans and Domestic Animals."

3. Add the following language in **bold typeface** on page 4 (the label booklet cover) directly under "Turflon* D Low Volatile Weed Killer"

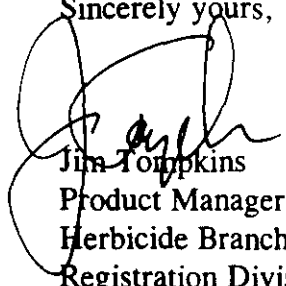
"To be applied only under the direct supervision of licensed pesticide applicators responsible for turf weed control programs."

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EPA Reg. No. 62719-67

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.

The amended label supersedes all previously accepted labels. A stamped copy of the label is enclosed for your records. Please submit one copy of the final printed label before you release the product for shipment.

Sincerely yours,



Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure

3/13

ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 23 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
62719 - 67

(Base label):

(Logo) Dow AgroSciences

Turflon* D

Low Volatile Weed Killer

For the control of annual and perennial broadleaf weeds in 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 BEE: 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 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.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Harmful If Swallowed • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Skin Reactions In Some Individuals

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

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

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.

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

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

Do not use or store near heat or open flame.

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 using this product, read Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies 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

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

Specialty Herbicide

Net Contents XXX

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(Label booklet cover):

(Logo) Dow AgroSciences

Turflon* D

Low Volatile Weed Killer

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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 inside of label booklet for additional precautionary information including Personal Protective Equipment (PPE), User Safety Recommendations and Directions for Use including Storage and Disposal.

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

Specialty Herbicide

7/13

Net Contents XXX

(Page 1 through end):

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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 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

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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

Do not use or store near heat or open flame.

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 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 enter or allow others to enter the treated area until sprays have dried.

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. 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.**

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 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.

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.

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)	lamb'squarter
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 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.

Labeled Uses

Turf**Broadcast Treatment of Residential, Commercial, and Recreational 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. 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 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

Seller 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. SELLER 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 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 Seller'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.

Seller shall not be liable for losses or damages resulting from handling or use of this product unless Seller is promptly notified of such loss or damage in writing. In no case shall Seller 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 the Seller 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: __/__/__