AUG

4 1998

PM 23 62719-86 8-4-98 Accepted Stamp on pg. 30f19

Dennis H. Lade, Ph.D. Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268

Dear Dr. Lade:

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Subject: CURTAIL[®] M EPA Registration No. 62719-36 Application and Letter Dated June 17, 1998, Request To Amena Registration by Multiple Label Revisions Described as "Proposed Amended Labeling for Curtail M Herbicide Based on EPA Stamped Accepted Labeling Dated February 27, 1997"; and Resubmissions Dated July 20, 1998 and July 29, 1998, Described as "Proposed Changes by Amendment"

The proposed amendments to the subject pesticide product registration have been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act (FIRA) as amended, provided that:

- 1. Remove all editoral notes, strikeouts and underlining associated with the revisions of the labeling.
- 2. You submit one (1) copy of the final printed labeling before releasing the product for snipment, under the subject labeling.

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.

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

Sincerely yours,

Joanne I. Miller Product Manager (23) derbicide Branch Registration pivision (75050)

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Curtail* M

EPA Reg. No. 62719-86

Registration Notes:

Current label text based on EPA accepted copy dated February 27, 1997.

Proposed Changes by Amendment:

- 1. Revised KOROC statement and signal word in accordance with recent guidance from EPA labeling unit.
- 2. Deleted items in User Safety Recommendations not consistent with the acute toxicity of Curtail M (Toxicity Cat. III).
- Physical and Chemical Hazards: Deleted the word "Combustible" in accordance with 40 CFR Part 156.10(h)(2)(iii).
- 4. Revised Environmental Hazards groundwater statement.
- 5. Directions for Use
 - a. Added the following statement to General Use Precautions section: "Use directions in Dow AgroSciences supplemental labeling may supersede directions or limitations in this labeling." This statement would allow directions/uses on EPA-accepted supplemental labeling, that might otherwise be in conflict with the main label, without amending the main product label.
 - b. Added instructions for sprayer clean-out.
 - c. Rotation crop restrictions reorganized into more easily understood table format.
 - d. Added instructions for field bioassay.
 - e. Added mixing instructions and tank mixing precautions per PR-Notice 82-1 and guidance from EPA reviewer.
 - f. Added weed species to Weeds Controlled section and classified weeds according to life cycle, i.e., annual (a), biennial (b) and perennial (p).
 - g. Added instructions for spot treatment.
 - h. Deleted detailed tank mixing information for other products in barley, oats and wheat section.
 - i. In general, Directions for Use were revised to harmonize with other clopyralid-containing products and edited for clarity and user-friendliness throughout.
- Note: This draft version contains final changes requested by EPA reviewer, Eugene Wilson on July 27, 1998.

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

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(Base label):

(logo) Dow AgroSciences LLC

Curtail* M

For Selective Control of Broadleaf Weeds in Wheat and Barley Not Underseeded with a Legume, Fallow Cropland, Grasses Grown for Seed, and Conservation Reserve Program (CRP) Acres.

Active Ingredient(s):	
clopyralid: 3,6-dichloro-2-	
pyridinecarboxylic acid	5.0%
MCPA: 2-methyl-4-	
chlorophenoxyacetic acid,	
2-ethylhexyl ester	43.4%
Inert Ingredients	51.6%
Total	100.0%

Contains Petroleum Distillates

ACCEPTED with COMMENTS In EPA Letter Dated

AUG 4 1998

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

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Acid Equivalents:

3,6-dichloro-2-pyridinecarboxylic acid - 5.0% - 0.42 lb/gal (0.42 lb/gal) 2-methyl-4-chlorophenoxyacetic acid, 27.8% - 2.35 lb/gal (2.35 lb/gal)

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

Keep Out of Reach of Children

CAUTION PRECAUCION

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

Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist.

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category B 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 or Butyl Rubber
- · 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 Statements

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.

Statement of Practical Treatment

If in eyes: Flush with plenty of water for at least 15 minutes. Get medical attention if irritation persists. If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists. If swallowed: Do not induce vomiting. Call a physician immediately.

Environmental Hazards

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 or rinsate.

<u>Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions</u> contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid 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 that 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.

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 additional precautionary information including Perschal 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" and "Limitation of Remedies" inside label booklet.

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Page 3

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. 62719-86

EPA Est. 464-MI-1

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Herbicide

Net Contents XXX

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(Datapack cover):

(logo) Dow AgroSciences LLC

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chlorophenoxyacetic acid,	
2-ethylhexyl ester	
Inert Ingredients	
Total	

Contains Petroleum Distillates

Acid Equivalents:

3,6-dichloro-2-pyridinecarboxylic acid - 5.0% -0.42 lb/gal (0.42 lb/gal) 2-methyl-4-chlorophenoxyacetic acid, 27.8% -2.35 lb/gal (2.35 lb/gal)

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(Page 1 through end):

Precautionary Statements

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

Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist.

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 B 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 or Butyl Rubber
- 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 Statements

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.

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Environmental Hazards

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 or rinsate.

Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate groundwater which may be used for irrigation or drinking purposes. Users are advised not to apply clopyralid 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 that 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.

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 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 or Butyl Rubber

Shoes plus socks

Storage and Disposal

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

Store above 10°F or warm and 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. **Container Disposal (Metal): 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. **Container Disposal (Plastic): 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.

General Information

Curtail* M herbicide is recommended for selective control of broadleaf weeds in wheat and barley not underseeded with a legume, fallow cropland (including summer fallow, post-harvest, and set-aside acres), grasses grown for seed, and Conservation Reserve Program (CRP) acres.

General Use Precautions

[Editor's note: Sections on sprayer cleanout and field bioassay have been added to General Use Precautions; several items have been moved or reformatted for clarity. Text changes are ac shown by edit marks.]

Use directions in Dow AgroSciences supplemental labeling may supersede directions or limitations in this labeling.

Do not contaminate irrigation ditches or water used for irrigation or domestic purposes.

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

Apply only once per crop cycle, except for grasses grown for seed.

Excessive amounts of this herbicide in the soil may temporarily inhibit seed gemination or plant growth.

Do not transfer livestock from treated grazing areas onto to sensitive broadleaf crop areas without first allowing 7 days of grazing on an untreated pasture. Otherwise, urine may contain enough clopyralid to cause injury to sensitive broadleaf plants.

Straw from troated areas, or manure from animals which have grazed troated areas, cannot be used for composting or mulching on ground where susceptible crops may be grown the following season. To promote herbicide decomposition, plant material should be evenly incorporated or burned.

Residues in Plants or Manure: Do not use crop residues including straw from treated areas or manure from animals that have grazed treated areas for composting or mulching where susceptible plants may be grown the following season. Do not spread manure from animals that have grazed or consumed treated forage on land used for growing susceptible broadleaf crops. To promote herbicidal decomposition, crop residues should be evenly incorporated or burned. Breakdown of clopyralid in crop residues or manure is more rapid under warm, moist soil conditions and may be enhanced by supplemental irrigation.

Do not move treated soil and avoid situations where treated soil particles may blow into areas where susceptible crops are grown. Violent windstorms may move soil particles. If this product is on soil particles and they are blown onto susceptible plants, visible symptoms may appear. Serious injury is unlikely. The hazard of movement of this product on dust is reduced if treated fields are irrigated or if rain occurs shortly after application.

Advisory (Avoid Movement of Treated Soil): Avoid conditions under which soil from treated areas may be moved or blown to areas containing susceptible plants. Wind-blown dust containing clopyralid may produce visible symptoms, such as epinasty (downward curving or twisting of leaf petioles or stems), when deposited on susceptible plants, however, serious injury is unlikely. To minimize potential movement of clopyralid on wind-blown dust, avoid treatment of powdery dry or light sandy soils until soil is settled by rainfall or irrigation or irrigation shortly after application.

Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label. [Editor's note: Redundant statements deleted - see Environmental. Hazards and first statement under Directions for Use header.]

Wheat, barley, eate, grasses or sugar boots (including boots grown for seed) may be planted less than 12 months after treatment. [Editor's note: See Rotation Crop Restrictions.]

Rotational Crop Restrictions

Residues of Curtail M in treated plant tissues, including the treated crop or weeds, which have not decayed may affect succeeding susceptible crops.

(All States Except Idaho, Nevada, Oregon, Utah and Washington)

- Do not plant Wheat, barloy, eats, grasses and som within 30 days after an application of Curtail M.,

- Do not plant sugar boots (including boots grown for sood) in the same growing season following an application of Curtail M.
- Do not plant alfalfa, asparagus, canola, colo crops, grain sorghum, onions, popcorn, construction of curtail M.

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Do not plant dry boans, soybeans and sunflowers for 10.5 months after an application of Curtail M, or 18
months if soils contain loss than 2% organic matter and natural precipitation is loss than 15 inches
during the 10.5 months following treatment. For these areas, see "Special Conditions" below.

To avoid potential phytotoxicity all other crops including peas, lentils, potatoes, and broadleaf crops grown for seed should not be planted for 18 months after treatment unless the risk of injury is acceptable.

Special Conditions: Residues of Curtail M in plant tissues which have not completely desayed may affect succeeding susceptible crops. In areas defined previously as low in organic matter and precipitation, consitive crops such as dry beans, soybeans, and sunflowers may be injured when planted 12 months after treatment. Unless the risk of injury is acceptable, these crops should not be planted until 18 months after treatment. The potential for injury may be reduced by burning, removal, or incorporation of treated crop residues with a minimum of 2 supplemental Fall irrigations.

Rotation Crop	Rotation Crop	Comments, Conditions and Limitations		
barley, grasses, <u>field</u> com, grasses, oats, wheat	30 days	Listed crops may be planted 30 days following application of Curtail M.		
Sugar beets	<u>5 months</u>	Do not plant in the same growing season following application of Curtail M		
alfalfa, asparagus, canola (rapeseed), cole crops, dry beans ¹ , grain sorghum, mint, onions, popcorn, safflower, soybeans ¹ , sunflowers ¹ , sweet corn, strawberries	10.5 months	Do not plant listed crops for 10.5 months following application of Curtail M. ¹ If soils contain less than 2% organic matter and natural precipitation is less than 15 inches during the 10.5 months following application, these (footnoted) crops should not be planted until 18 months after application unless the risk of crop injury is acceptable. The potential for injury may be reduced by burning, removal, or incorporation of treated crop residues followed by a minimum of 2 supplemental fall irrigations.		
Lentils, peas, potatoes and broadleaf crops grown for seed	18 months	Do not plant listed crops for 18 months after application unless the risk of crop injury is acceptable. The potential for injury may be reduced by burning, removal, or incorporation of treated crop residues followed by a minimum of 2 supplemental fall irrigations.		

(Idaho, Nevada, Oregon, Utah and Washington Only)

- Do not plant wheat, barley, oats, grasses or field corn within 30 days after an application of Curtail M.

- Do not plant sugar beets (including beets grown for seed) in the same growing season following an application of Gurtail M.
- Do not plant alfalfa, asparagus, canola (rapesced), Brassica species grown for seed, cole crops, dry beans, soybeans, grain sorghum, mint, onions, popcorn, safflower, sunflower, sweet corn or strawberries during the first 12 months after an application of Curtail M.
- For areas receiving 18 Inches or more of annual precipitation (not including irrigation): Alfalfa, asparagus, dry beans, canola (rapeseed), Brassica species grown for seed, grain sorghum, minit, onions, popeorn, sweet corn, soybeans, strawberries and sunflowers may be planted 12 months after an application of Curtail M. Cole crops, lentils, peas, potatoes (including potatoes grown for seed), safflower or broadleaf crops grown for seed (excluding Brassica species) may also be planted 12 is months after treatment, however, unless risk of injury is acceptable, these crops should not be planted until 18 months after treatment.
- For areas receiving less than 18 inches average annual precipitation (not including irrigation): Alfalfa, dry beans, soybeans, sunflowers, lentils, peas, potatoes (including potatoes grown for <ee4) or broadleaf crops grown for seed (excluding Brassica species) should not be planted until 18 months after

lot

an application of Curtail M. However, crop injury and/or yield loss may occur up to 4 years after application.

Rotation Crop	Rotation Crop Interval [†]	Comments, Conditions and Limitations
barley, grasses, field corn, oats, sugar beets, wheat	30 days	Listed crops may be planted 30 days following application of Curtail M.
sugar beets	<u>5 months</u>	Do not plant in the same growing season following application of Curtail M
alfalfa, asparagus, Brassica species grown for seed, broadleaf crops grown for seed (excluding Brassica species) ¹ , canola (rapeseed), cole crops ¹ , dry beans, grain sorghum, lentils ¹ , mint, onions, peas ¹ , popcorn, potatoes (including potatoes grown for seed) ¹ , safflower ¹ , soybeans, sunflower, sweet com, strawberries	12 months	In areas receiving greater than 18 inches of rainfall (not including irrigation), listed crops may be planted 12 months after an application of Curtail M. ¹ Unless risk of injury is acceptable, these (footnoted) crops should not be planted until 18 months after application.
alfalfa, dry beans, soybeans, sunflowers, lentils, peas, potatoes (including potatoes grown for seed) and broadleaf crops grown for seed (excluding <i>Brassica</i> species)	18 months	In areas receiving less than 18 inches of rainfall (not including irrigation): Listed crops should not be planted until 18 months after an application of Curtail M. However, crop injury and/or yield loss may occur up to 4 years after application. In such cases a field bioassay may be useful to determine suitability for planting a given crop.

¹Note: The above restrictions are based on average annual precipitation, regardless of irrigation practices. Use of Curtail M in accordance with the rotational crop restrictions stated, if followed, is not expected to result in crop injury; however, because Curtail M is dissipated in the soil by microbial activity and the rate of microbial activity is dependent on soil moisture, temperature and organic matter, accurate prediction of potential rotational crop injury is impossible. In areas of low organic matter (<2.0%) and less than 15 inches average annual precipitation, potential for crop injury may be reduced by burning or removal of plant residues, supplemental fall irrigation and deep moldboard plowing prior to planting the sensitive crop.

Field Bioassay Instructions: in fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample field conditions such as soil texture, soil pH, drainage, and any other variable that could affect the seed bed of the new crop. Field bioassay at any time between harvest of the treated crop and the planting of the rotational crop. Observe the test crop for herbicidal activity, such as poor stand (effect on seed germination) chlorosis (vellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the test rotational crop; plant only a labeled crop or crop listed in the table above for which the rotational interval has clearly been met.

Advisory Statements

Avoiding Injury to Non-target Plants

This product can affect susceptible broadleaf plants directly through foliage and indirectly by root uptake from treated soil. Therefore, do not apply Curtail M directly to or allow spray drift to come in contact with vegetables, flowers, grapes, tomatoes, potatoes, beans, lentils, peas, alfalfa, sunflowers; soybeans, safflower, or other desirable broadleaf crops and ornamental plants or soil where these sensitive crops will be planted the same season.

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Avoid Spray Drift

Applications should be made to avoid <u>Avoid</u> spray drift since very small quantities of the spray, which may not be visible, may severely injure susceptible crops during both growing active growth and or dormant periods. Use coarse sprays to minimize drift-since, under adverse weather conditions, fine spray droplets may drift a mile or more. Fine droplets can present a drift hazard. A drift control or deposition agent-such as Nalco-Trol suitable for agricultural use may be used with this product to aid in reducing spray drift. If used, follow all use recommendations and precautions on the product label.

Ground Application: To minimize spray drift, apply Curtail M in a total spray volume of 10 or more gallions per acre as a large-droplet, low pressure spray. Refer to spray equipment manufacturer's recommendations for additional information on gallons per acre-spray volume, spray pressure, sprayer speed, nozzle types type and arrangements arrangement of nozzles, nozzle heights height of nozzles above the target canopy, etc., for respective application equipment. Spot treatments should only be applied with a calibrated boom to provent misapplication. With ground equipment, spray Spray drift can be lessened by keeping the spray boom as low as possible; by applying no more than 20 gallons of spray per acre; by using no more than 30 pounds per square inch (psi) spraying pressure with large dropletproducing nozzle tips; by using larger nozzle tips rather than increasing pressure to increase spray volume; and by spraying when wind velocity is low; and by stopping all spraying when wind exceeds 6 to 7 miles per hour. Do not apply with hollow cone-type insecticide or other nozzles that produce a fine-droplet spray. Keep operating spray pressures at the lower end of the manufacturer's recommended pressure range for the specific nozzle type used. Low pressure nozzles are available from spray equipment manufacturers. Select nozzles and pressures that provide adequate plant coverage but minimize the production of fine spray particles. Avoid application under completely calm conditions which may be conducive to air inversions.

Aerial Application: With aircraft, drift can be lessened by applying a coarse spray; by using no more than 30-pounds <u>psi</u> spray pressure at the nozzles; by using straight-stream nozzles directed straight back; by using a spray boom no longer than 3/4 the wing span of the aircraft; and by spraying only when wind velocity is loss than 6 mph low.

Do not apply <u>Avoid application</u> by aircraft when an air temperature inversion exists. Such a condition is characterized by little or no wind and with lower air temperature near the ground than at higher levels. The use of smoke device on the aircraft or continuous smoke column at or near site of application will indicate air direction and velocity, and whether a temperature is present, which is shown as indicated by <u>horizontal</u> layeting of the smoke.

Sprayer Clean-Out

To avoid injury to desirable plants, equipment used to apply Curtail M should be thoroughly cleaned before re-using to apply any other chemicals.

- 1. Rinse and flush application equipment thoroughly after use at least three times with water. Dispose of all rinse water by application to treatment area or apply to non-cropland area away from water supplies.
- 2. During the second rinse, add 1 gt of household ammonia for every 25 gallons of water. Circulate the solution through the entire system so that all internal surfaces are contacted (15-20 min). Let the solution stand for several hours, preferably overnight.
- 3. Flush the solution out of the spray tank through the boom.

<u>4.</u>	Rinse the	system	<u>twice v</u>	<u>vith clean</u>	water, re	ecirculating	and draining each time.	
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5. Remove nozzles and screens and clean separately.

Mixing Instructions

- 1. Add 3/4 of the required spray volume to the spray tank and start agitation.
- 2. Add the required amount of Stinger.

3. Add any surfactants, adjuvants or drift control agents according to manufacturer's label.

4. Agitate during final filling of the spray tank and maintain sufficient agitation during application to ensure uniformity of the spray mixture. Tank Mixing: This product may be applied in tank mix combination with labeled rates of other products provided (1) the tank mix product is labeled for the timing and method of application for the use site to be treated; and (2) tank mixing is not prohibited by the label of the tank mix product.

Tank Mixing Precautions:

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- Do not exceed recommended application rates. Do not tank mix with another pesticide product that contains the same active ingredient as this product unless the label of either tank mix partner specifies the maximum dosages that may be used.
- For products packaged in water soluble packaging, do not tank mix with products containing boron or mix in equipment previously used to apply a product mixture containing boron unless the tank and spray equipment has been adequately cleaned. (See instructions for Sprayer Clean-Out.)
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.

Tank Mix Compatibility Testing: A jar test is recommended prior to tank mixing to ensure compatibility of Curtail M and other pesticides. Use a clear glass quart jar with lid and mix the tank mix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, jels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination should not be used.

Application Directions

Timing: Apply to actively growing weeds. Extreme growing conditions such as drought or near freezing temperatures prior to, at and following time of application may reduce weed control and increase the risk of crop injury at all stages of growth. Only weeds which are that have emerged at the time of application will be affected. Wet foliage at the time of application may decrease control. If foliage is wet at the time of application, control may be decreased. Following application, Curtail M will be rainfast within 6-8 hours after application.

<u>Application</u> Rate <u>Ranges:</u> Generally, lower labeled application rates will be satisfactory for young, succulent growth of <u>censitive susceptible</u> weed species. For less <u>sensitive species</u>, perennials and under conditions where control is more difficult (plant stress conditions such as drought or extreme temperatures, dense wood stands and/or larger woods) the higher labeled rates will be needed. <u>Higher</u> <u>labeled rates will generally be required for more tolerant species</u>, perennials, weeds in dense stands or in <u>advanced stages of growth</u>, or under conditions of plant stress such as drought or extreme temperatures. Weeds in fallow <u>land</u> or other areas where <u>crop</u> competition <u>from crops</u> is not a factor present will generally require higher rates to obtain for control or suppression.

Coverage: Adequate spray coverage and drift control are important. Obtaining a balance between spray coverage and drift control may sometimes be difficult but can be achieved, provided the applicator understands the factors affecting coverage and drift. Factors affecting spray coverage include spray volume, crop canopy and wood density. As crop canopy and wood density increase, spray volume should be increased to obtain equivalent wood control. Refer to manufacturer's recommendations for information on the relationship between gallons per acre, spray prossure, sprayer speed, nozzle type and arrangement, nozzle height above the target canopy, droplet size and drift potential for respective, application equipment. Do not apply less than 2 and not more than 40 gallons per acre total spray '.' volume. For best results, apply 5 or more gallons per acre by air and 10 or more gallons per acre by ground. Reducing total spray volume may result in docreased coverage and wood control; Use enough total spray volume and a delivery system to provide thorough coverage and a uniform epray pattérn. Dis not apply where spray volume due to proximity of succeptible crops or other desirable of the spray volume for a problem due to proximity of succeptible crops or other desirable of the spray of the spray volume.

Use sufficient spray volume to provide thorough and uniform spray coverage of target weeds. Do not broadcast apply in less than 2 gallons of total spray volume per acre. For best results and to minimize

spray drift, apply in a spray volume of 10 or more gallons per acre. In general, spray volume must be increased as crop canopy, height and weed density increase in order to obtain equivalent weed control. Use only nozzle types and spray equipment designed for herbicide application. To reduce spray drift, follow precautions under "Avoiding Injury to Non-target Plants" in "Advisory Statements" section of this label.

Use of Surfactants: Addition of wetting and/or penetration agents is not usually necessary when using Curtail M; however, if a surfactant will be added to the spray solution, use a non-ionic surfactant-approved suitable for use in growing crops of at least 80% active ingredient and **do not exceed** 4 pints per 100 gallons of spray solution (0.5% v/v). Adding-Use of a surfactant to in the spray mixture may increase weed control effectiveness-on weeds but may reduce-selectivity to the crop safety, particularly under conditions-which promote of plant stress.

Use With Sprayable Liquid Fertilizer Solutions: Curtail M is compatible with most non-pressurized liquid fertilizer solutions; however, if these liquid fertilizer solutions are to be sprayed applied with Curtail M, a compatibility test (jar test) should be made prior to mixing. Jar tests are particularly important when a new batch of fertilizer or pesticide is used, when the water source changes, or when tank mixture ingredients or concentrations are changed. A compatibility test is performed by pouring mixing the spray components (in the desired order and proportions) into a clear glass jar before mixing in the spray tank. Use of a compatibility aid such as Unite or Compex may help obtain and maintain a uniform spray solution during mixing and application. Agitation in the spray tank must be vigorous to compare with jar test agitation. For best results, liquid fertilizer-rates should not exceed 50% of the total spray volume. Premix Curtail M with water and add to the liquid fertilizer/water mixture while agitating contents of the spray tank. Apply the spray the same day it is prepared while maintaining continuous agitation.

Note Advisory: Foliar-applied liquid fertilizers, used as a carrier for Curtail M, can cause yellowing or leaf burn of crop foliage.

Spot Treatments: To prevent misapplication, spot treatments should be applied only with a calibrated boom or with hand sprayers according to directions provided below.

Hand-Held Sprayers: Hand-held sprayers may be used for spot applications of Curtail M if care is taken to apply the spray uniformly and at a rate equivalent broadcast application. Application rates in the table are based on an area of 1,000 sq ft. Mix the amount of Curtail M (fl oz or mi) corresponding to the desired broadcast rate in one or more gallons of spray. To calculate the amount of Curtail M required for larger areas, multiply the table value (fl oz or mi) by the area to be treated in "thousands" of square feet, e.g., if the area to be treated is 3,500 sq ft, multiply the table value by 3.5 (calc. 3,500 + 1,000 = 3.5). An area of 1000 sq ft is approximately 10.5 X 10.5 yards (strides) in size.

Amount of Curtail M per gallon of spray to Equal Specified Broadcast Rate								
1/3 pt/acre	1/2 pt/acre	3/4 pt/acre	1 pt/acre	2 pt/acre	3 pt/acre	4 pt/acre		
<u>1/8 fi oz</u> (4 ml)	<u>1/5 fl oz</u> (6 ml)	<u>1/4 fl oz</u> (8 ml)	<u>3/8 fl oz</u> (11 ml)	<u>3.4 f(oz</u> (22 ml)	<u>1 1/8 fl oz</u> (33 ml)	<u>1.5 fl oz</u> (44 ml)		

 $^{t}1$ fl oz = 29.6 (30) ml

Note: For a rate such as 1 3/4 pt/acre, add together the values for 3/4 pt/acre and 1 pt/acre.

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Broadleaf Weeds Controlled

Curtail M is recommended for selective, post-omergence control of the following broadleaf weeds in wheat and barley not underseeded with a legume and land in the Conservation Reserve Program (CRP).

Note: The letter in parentheses (-) after the listed weed indicates if life cycle is annual (a), biennial (b), or

perennial (p). Alfalfa (from seed only) (p) Artichoke, Jerusalem (p) Buckwheat, wild (a) Buffalobur (a)1 Burdock, common (b) Chamomile, false (scentless) (a) Chamomile, mayweed (dogfennel) (a) Clover, black medic (a) Clover, hop (a) Clover, sweet (b) Clover, red (p) Clover, white (p) Cocklebur, common (a) Coffeeweed (a) Comflower (bachelor button) (a) Dandelion (p) Dock, curly (p) Flixweed (a) Groundsel, common (b) Hawksbeard, narrowleaf (a) Hawkweed, orange (p) Hawkweed, yellow (p) Horseweed (a) Jimsonweed (a) Knapweed, diffuse (b) Knapweed, Russian (p)¹ Knapweed, spotted (b) Kochia (2-4 leaf) (a) Ladysthumb (a) Lambsquarters, common (a) Lettuce, prickly (a) Mustard, tumble (Jim Hill) (a)

Mustard, wild (a) Nightshade, cutleaf (a) Nightshade, hairy (a) Pennycress, field (fanweed) (a) Pigweed, redroot (a) Pineappleweed (a) Plantain (p) Radish, wild (a) Ragweed, common (a) Ragweed, giant (a) Salsify, meadow (goatsbeard) (b) Shepherdspurse (a) Sicklepod (a) Smartweed, Pennsylvania (a) Sorrel, red (p) Sowthistle, annual (a) Sowthistle. perennial (p)¹ Starthistle, yellow (a) Sunflower, common (a) Teasel, common (b) Thistie, bull (b) Tansymustard, pinnate (a)¹ Thistle, Canada (p) Thistle, musk (b) Thistle, Russian (1-3-leaf) (a)¹ Velvetleaf (a) Vetch (a) Volunteer beans (a) Volunteer lentils (a) Volunteer peas (a)

¹These weeds may only be suppressed. Suppression is a visual reduction **in we**ed competition (reduced population or vigor) as compared to untreated areas. The degree <u>and duration</u> of weed control-and <u>duration of effect</u> will vary with weed size and density, <u>spray application</u> rate and coverage, and growing conditions before, during and after the time of treatment. For perennial weeds, Curtail M will control the initial top growth and inhibit regrowth during the season of application (season-long control). At higher rates shown on this label, Curtail M may cause a reduction in shoot regrowth in the season following application; however, plant response may be inconsistent due to inherent variability in shoot regrowth from perennial root systems.

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Crop Uses

Barley, Oats and Wheat

Timing: Apply Curtail M in the spring to actively growing wheat, barley or oats once 3 leaves have unfolded on the main stem up to the jointing stage (first node of main stem detectable). To control or suppress weeds listed above, make application after maximum emergence of the target weeds but before they exceed 3 inches in height or diameter (for rosettes). To obtain season-long control of perennial weeds such as Canada thistle, apply after the majority of the weed's basal leaves have emerged from the soil, but before up to bud stage. A later timing of application (when the grain is between the jointing and boot stages) may be used to treat later-emerging weeds; however, do not apply unless the risk of injury is acceptable. Do not apply after the boot stage.

Note: Do not permit <u>lactating</u> dairy animals or meat animals being finished for slaughter to forage or graze treated grain fields within 1 week after treatment. Do not harvest hay from treated grain fields.

Rate: Apply 1 3/4 to 2 1/3 pints per acre of Curtail M-per acre. The higher rate may be used when the condition of the weeds and/or crop at the time of treatment may prevent optimum control.

Note: Higher rates of Curtail M, or any application of Curtail M following a spring post-emergence treatment with 2,4-D or MCPA, may increase the risk of crop injury.

Tank Mixtures for Wheat and Barley

This product may be tank mixed with the following herbicides for control of additional weeds in wheat, barley and oats. Read and follow the label of each tank mix product used for precautionary statements, directions for use, weeds controlled and geographic and other restrictions. When tank mixing, use in accordance with the most restrictive of label limitations and precautions. No label decages should be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Curtail M may be applied in tank mix combination with labeled rates of other products registered for postemergence application in wheat, barley, and oats. See "Tank Mixing Precautions" under "Mixing Instructions". When tank mixing, do not exceed recommended application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

Active	Product	Formulation	
-			:
chlorsulfuron	Gloan		[·] 1/6 to 1/4 wt oz
dicamba ^{1,2}	Banvel	<u> </u>	
difenzoquat ³	Avenge		<u>2 1/2 to 4 pt</u>
diuron	Direx 4L		
	-Diuron 4L	· · · · · · · · · · · · · · · · · · ·	
· · · · · · · · · · · · · · · · · · ·	Diuron 80 WDG		1/2 to 1 lb
	- Diuron DF		
2,4-D ^{2,3}	- <u></u>	<u>4 lb/gal</u>	Up to 1/2-pt
metribuzin ³	- Lexone DF		
	-Sencor DF	10/0 81	
metsulfuron	Control Di		
methyl ³	Ally		1/10 wt oz
torbutryn ²	Igran 80 WP	80% WP	6 to 10 vt oz
tribennuron-methyl-and-			
- thifensulfuron methyl ³ -	-Harmony Extra		
tribuneron-methyl ⁴	-Express		1/6 to 1/4 wt oz

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Precautions:

Tank mixes of Banvel and Curtail M may be useful in broadening the annual weed control spectrum but may reduce control of perennials, such as Canada thistle.

²Note: Do not tank mix Curtail M with 2,4-D or dicamba unless the risk of crop injury is acceptable. ²Tank mix for application on wheat and barley only.

Grasses Grown for Seed

Timing: Apply only to established grasses before the boot stage <u>of growth</u>. Applications in the boot stage and beyond will result in increased injury. Do not apply to bentgrass unless injury can be tolerated. Potential for crop injury increases with higher rates. Re-treat as necessary but do not exceed 3 1/2 pints per acre of Curtain M per season. For control of late-emerging Canada thistle, a pre-harvest treatment may be made after grass seed is fully developed. Treatment of Canada thistle in the bud stage and later may result in less consistent control. Post-harvest fall treatments may be made to actively growing Canada thistle after the majority of basal leaves have emerged.

Rate: Use 1 3/4 to 3 1/2 pints <u>per acre</u> of Curtail M-per acre for control of annual weeds and Canada Thistle. The potential for crop injury exists due to the MCPA component of this product and must be balanced against the benefits of improved weed control.

Tank Mixtures For Grasses Grown For Seed: Curtail M at 1 3/4 pints per acre may be tank mixed with Banvel or Buctril to improve the control of certain weeds. Refer to the "Small Grains Table" for use rates and tank mix guidelines See "Tank Mixing Precautions" under "Mixing Instructions". When tank mixing, do not exceed recommended application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

Conservation Reserve Program (CRP) For Seeding To Permanent Grasses Only

Do not use Curtail M if legumes or bentgrass are a desired cover during CRP.

Timing: Curtail M can be applied when perennial grasses have become are well established (tillering, with at least 1.5 inch long secondary roots, and good vigor) as indicated by vigorous growth and development of tillers and secondary roots. For control of weeds such as musk thistle, Canada thistle and knapweed (diffuse, spotted and Russian), apply to actively growing weeds after the majority of the basal leaves have emerged, but before up to bud stage. Later applications may result in less consistent control.

In fields with heavy weed density which are to be planted to CRP grasses, a pre-seeding application may be made. In general, cropland to be planted to CRP in the spring should be treated <u>during</u> the previous fall and cropland to be planted to CRP in the fall should be treated <u>during</u> the previous spring or summer. A pre-seeding treatment with Curtail M may cause visible injury and reduced seed production in some newly planted grass stands; however, grass stand establishment should be improved because of reduced weed competition. Wait at least 30 days after a treatment with Curtail M before seeding grasses.

After CRP, do not plant broadleaf crops in treated areas until an adequately sensitive bioassay shows that no detectable clopyralid is present in the soil.

Rate: Apply 1 3/4 to 4 3/4 quarts per acre of Curtail M-per acre. Do not exceed 1 3/4 quarts per acre for pre-seeding treatment.

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.

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.

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