



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 17 1991

File

Merlyn L. Jones  
DOWELANCO  
9330 Zionsville Road  
Indianapolis, IN 46268

OFFICE OF  
PREVENTION, PESTICIDES AND  
HARMFUL SUBSTANCES

SUBJECT: Label Amendment Submission of 07/23/93 in Response to PR Notice 93-7  
EPA Reg. No. 62719-92  
CONFRONT SPECIALTY HERBICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped-accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,

**BEST AVAILABLE COPY**

*James Tompkins*  
James Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Enclosures



Recycled/Recyclable  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

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9330 ZIONSVILLE RD  
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in Compliance with the PR Notice 93-7  
EPA Reg Nr. 62719-92  
CONFRONT SPECIALTY HERBICIDE

Change exclusionary statement to "Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes."

# Specimen Label

## Revisions:

- 1) Added a statement to the General Use Precautions section of the label to remove this product from the scope of the Worker Protection Standard.



# Confront\*

## Specialty Herbicide

For the control of annual and perennial broadleaf weeds in ornamental turf

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

### Active Ingredients:

triclopyr: 3,5,6-trichloro-2-pyridinyloxyacetic acid, triethylamine salt.....33.0%  
 clopyralid: 3,6-dichloro-2-pyridinecarboxylic acid, triethylamine salt..... 12.1%

Inert Ingredients .....54.9%

### Acid Equivalent:

triclopyr - 23.7% - 2.25 lb/gal  
 clopyralid - 7.9% - 0.75 lb/gal

EPA Reg. No. 62719-92

EPA Est. 464-MI-1

Net Contents 1 gal

## Precautionary Statements

**Hazards to Humans and Domestic Animals**

**Keep Out of Reach of Children**

**DANGER PELIGRO:**

Precaucion al usuario: Si usted no lee inglés, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

**Causes Irreversible Eye Damage - Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Skin Reaction In Some Individuals (Concentrate Product Only) - Harmful If Absorbed Through Skin, Or If Swallowed Or Inhaled**

Do not get in eyes, on skin, or clothing. When handling concentrate, wear eye protection and protective clothing such as long-sleeved shirt, long-legged pants, rubber gloves and footwear, i.e. neoprene or nitrile butadiene rubber. Avoid breathing vapors. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

**Note to Applicator:** In the dilute mix, no skin reaction is expected when used as directed.

### First Aid

**If in eyes:** Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention promptly.

**If on skin:** Wash with plenty of water. Get medical attention.

**If swallowed:** Promptly drink a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Call a physician.

**If inhaled:** Remove victim to fresh air. Get medical attention.

### 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. 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 containing sinkholes over limestone bedrock, severely fractured surfaces, and substrates which would allow direct introduction into an aquifer. Your local agricultural agencies can provide further information on the type of soil in your area and the location of groundwater

**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.**

In case of an emergency endangering life or property involving this product, call collect 517 636 4400

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

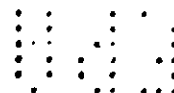
ACCEPTED  
with COMMENTS  
in EPA Letter Dated

FEB 17 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 62719-92

BEST AVAILABLE COPY

Confront\*



## 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.

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.  
**Storage:** Store above 28°F or agitate before use.  
**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residue 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.  
**Container Disposal:** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic containers, after triple rinsing, may be incinerated if allowed by state and local authorities. If burned, stay out of smoke.  
**General:** Consult federal, state, or local disposal authorities for approved alternative procedures.

### General Information

Confront herbicide is a broad-spectrum non-phenoxy weed killer for control of broadleaf weeds in ornamental turf.

### General Use Precautions

Apply this product only as specified on this label.

Do not apply Confront 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 and shrubs.

Do not reseed for three weeks after application. Grass clippings from turf treated with Confront are not recommended to be used for mulch or compost following treatment.

### 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 (except under "Low Volume Applications"); by keeping the operating spray pressures at the lower end of the manufacturer's recommended pressures for the specific nozzle type used (low pressure nozzles are available from spray equipment manufacturers), and by spraying when the wind velocity is low. In hand-gun applications, select the minimum spray pressure that will provide adequate plant coverage (without forming a mist).

Do not apply on ditches used to transport irrigation water. Do not apply where runoff or irrigation water may flow onto susceptible crops as injury may result.

The use of a mistblower is not recommended.

Do not apply this product to sod farms or turfgrasses grown for seed, including plants or plant materials grown for sale or research purposes.

## Weeds Controlled and Use Rate Recommendations

Weeds	Suggested Use Rate		
	Pt/Acre	Fl Oz/ 1000 Sq Ft	Tsp/ 1000 Sq Ft
black medic red clover hop clover white clover	1 <sup>†</sup>	0.37 (11 ml)	2.5
common chickweed common cocklebur common vetch creeping beggarweed dwarf beggarweed false dandelion hawkweed henbit matchweed mouse ear chickweed round leaf mallow sheep sorrel spotted catsear spurweed	1.5	0.55 (16 ml)	3.5
broadleaf plantain burdock coffeeweed common dandelion common ragweed lambsquarters narrowleaf plantain (buckhorn) shepherd's purse Virginia pepperweed	1.5 - 2	0.55 - 0.74 (16 - 22 ml)	3.5 - 4.5
Canada thistle curly dock English lawn daisy <sup>††</sup> goldenrod lespedeza musk thistle poison ivy smartweed wild buckwheat	2	0.74 (22 ml)	4.5
(Repeat Treatment May Be Necessary) common yellow woodsorrel creeping woodsorrel wild violet	2	0.74 (22 ml)	4.5

<sup>†</sup> For faster activity under good growing conditions, 1.5 pt/acre is recommended. For extended weed control, repeat applications are recommended.

<sup>††</sup> Six to eight weeks required for control.

### Preparing the Spray

Add about one-half the desired amount of clean water to spray tank. Add Confront and complete addition of water with agitation (running). Mix thoroughly and continue moderate agitation while spraying.

## Application Directions

Make application using equipment that will insure uniform coverage (see specific application directions below). Foliage sprays should be applied during warm weather when weeds are actively growing. Application under drought conditions may provide less than desirable results. Broadleaf weed species germinate at different times. Only emerged weeds present at time of application are controlled. When hard-to-control species are prevalent and during applications made in late summer when the plants are mature and during drought conditions, use the higher rates.

Apply Confront in a manner to avoid contacting nearby susceptible crops or other desirable plants. Very small amounts of spray drift may injure susceptible plants, including ornamental trees and shrubs. Use low spray pressures to minimize spray drift. (See "General Use Precautions"). Do not apply to exposed roots of shallow rooted trees and shrubs.

Apply 1 to 2 pints of Confront per acre to control broadleaf weeds growing in perennial bluegrass, tall fescue, fine fescues, buffalograss or perennial ryegrass. Do not use on other grass species such as bentgrass or St. Augustine grass, unless such injury can be tolerated. A maximum of 2 pints per acre of Confront per application is recommended. Do not use more than 5 pints per acre per year of treatment. Additional applications should not be made less than four 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 three weeks after application. Grass clippings from turf treated with Confront is not recommended to be used for mulch or compost following treatment.

## Standard Broadcast Applications

Apply 1 to 2 pints of Confront in enough water to deliver 20 to 200 gallons of total spray mix per acre (1 to 5 gallons spray per 1,000 square feet). Higher application volumes may be used when Confront is tank mixed with fertilizers.

## Low Volume Applications

Apply 1 to 2 pints of Confront in enough water to deliver from 5 to 20 gallons of total spray mixture per acre (1 pint to 1/2 gallon spray per 1,000 square feet). Use low pressures and application equipment capable of delivering a uniform droplet size that can wet the weed leaf surface. To improve spray coverage, the addition of an agricultural surfactant (such as Ortho X-77 or Tronic) at a rate of 1/4 to 1/2 pint per acre is suggested. Use the higher rates of surfactant for lower rates of product and lower spray volumes.

The use of ULV applications is not recommended.

## Spot Treatment of Ornamental Turf Using Portable Sprayers

Mix 0.5 to 1.0 fluid ounce of Confront in enough water to make 3 gallons of spray (1 to 2 pints per 100 gallons of spray) and apply at any time broadleaf weeds are susceptible by wetting foliage of undesirable plants to point of runoff.

## Warranty Disclaimer

DowElanco warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. DOWELANCO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

## Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, 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 DowElanco or the seller. All such risks shall be assumed by Buyer.

## Limitation of Remedies

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability or other legal theories), shall be limited to, at DowElanco's election, one of the following:

- (1) Refund of purchase price paid by buyer or user for product bought or
- (2) Replacement of amount of product used.

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

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of DowElanco or the seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.

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EPA APPROVAL ~~64-02-92~~ REPLACES ~~113-01-002~~

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