

62719-92

8-29-2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

AUG 29 2007

John J. Jachetta, Ph.D  
Regulatory Manager  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

RE: Notification of Minor Label Change  
EPA Registration Number: 62719-92  
Date of Submission: August 10, 2007

Dear Dr. Jachetta:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated August 10, 2007, for the product Confront. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" received but not reviewed and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



United States  
**Environmental Protection Agency**  
 Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number Dow AgroSciences/62719-92	2. EPA Product Manager James Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Dow AgroSciences/Confront	PM# 25	
5. Name and Address of Applicant (Include ZIP Code) Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**NOTIFICATION**

**AUG 29 2007**

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Changes by notification: 1. General Use Precautions and Restrictions: Revised the first statement underneath the heading to read "Sale and use of this product in Suffolk and Nassau counties in New York State is prohibited."; 2. At the request of the state of New York, added that state to the sentence "In California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only." and the sentence "In the states of California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only."

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name John J. Jachetta, Ph.D.		Title Regulatory Manager		Telephone No. (Include Area Code) (317) 337-4686 (fax: 317-337-4649)	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received  (Stamped)
2. Signature 			3. Title Regulatory Manager		
4. Typed Name John J. Jachetta, Ph.D. (jjj@chetta@dow.com)			5. Date August 10, 2007		

# Confront®

EPA Reg. No. 62719-92

## Registration Notes:

Source label text based on EPA accepted copy dated January 4, 2007.

### Changes by notification:

1. General Use Precautions and Restrictions: Revised the first statement underneath the heading to read "Sale and use of this product in Suffolk and Nassau counties in New York State is prohibited."
2. At the request of the state of New York, added that state to the sentence "In California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only." and the sentence "In the states of California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only."

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(Base Label):

**NOTIFICATION**

**AUG 29 2007**

**Confront®**

**Specialty Herbicide**

**For the control of annual and perennial broadleaf weeds in established turfgrass including, but not limited to, sod farms**

**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%
Other Ingredients .....	54.9%
Total.....	100.0%

**Acid Equivalent:**

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

**Keep Out of Reach of Children**

**DANGER            PELIGRO**

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.)

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**Precautionary Statements**

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**Hazards to Humans and Domestic Animals**

**Corrosive • Causes Irreversible Eye Damage • Harmful If Swallowed, or Inhaled • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Reactions In Some Individuals**

**Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Avoid breathing spray mist.**

**Personal Protective Equipment (PPE)**

**Applicators and other handlers must wear:**

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**Engineering Controls**

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the 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**

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**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 in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**If swallowed:** Call a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**If inhaled:** Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

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.

**Note to Physician:** Probable mucosal damage may contraindicate the use of gastric lavage.

**Environmental Hazards**

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

Triclopyr has properties and characteristics associated with chemicals detected in groundwater. The use of triclopyr in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

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.

**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](http://www.dowagro.com).

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

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EPA Reg. No. 62719-92

EPA Est. \_\_\_\_\_

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

Net Contents \_\_\_\_\_

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(Label booklet):

# Confront®

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triclopyr - 23.7% - 2.25 lb/gal  
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 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.**

**Net Contents** \_\_\_\_\_

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(Page 1 through end):

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**Precautionary Statements**

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**Hazards to Humans and Domestic Animals****DANGER**

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**Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Avoid breathing spray mist.**

**Personal Protective Equipment (PPE)**

**Applicators and other handlers must wear:**

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**Engineering Controls**

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the 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.
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**Environmental Hazards**



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Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

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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.

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### Directions for Use

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

#### 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 the label about personal protective equipment, restricted-entry interval, and notification to workers (as applicable). The requirements in this box 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.

For early entry into 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, wear:

- Coveralls
- Chemical-resistant gloves
- 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.

**Entry Restrictions for Non-WPS Uses:** 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 and disposal.

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

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Disposal (Plastic):** Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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**Container Disposal (Metal): 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.

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

## General Information

Confront® specialty herbicide is a broad-spectrum weed killer for control of broadleaf weeds in established cool season and warm season turfgrass, including, but not limited to, turfgrass in sod farms with noted exceptions.

Confront is recommended for use on the following turfgrass species:

### Established Cool Season Turfgrass

Common Name	Scientific Name
bentgrass †	<i>Agrostis species</i>
bluegrass, Kentucky	<i>Poa pratensis</i>
fescue, chewing	<i>Festuca rubra var. commutata</i>
fescue, creeping red	<i>Festuca rubra</i>
fescue, sheeps	<i>Festuca ovina</i>
fescue, tall	<i>Festuca arundinaceae</i>
ryegrass, perennial	<i>Lolium perenne</i>

† On bentgrass, do not apply more than 1 pint of Confront per acre (0.37 fl oz or 2.5 tsp per 1000 sq ft) unless turfgrass injury can be tolerated. To minimize turfgrass injury, additional applications should be made at least four weeks apart. Avoid swath overlaps.

### Established Warm Season Turfgrass †

Common Name	Scientific Name
bahiagrass	<i>Paspalum notatum var. Saurae parodi</i>
Bermudagrass ††	<i>Cynodon dactylon</i>
buffalograss	<i>Buchloe dactyloides</i>
centipedegrass	<i>Eremochloa ophiuroides</i>
fescue, tall (growing in warm season areas)	<i>Festuca arundinaceae</i>
zoysiagrass	<i>Zoysia japonica</i>
zoysiagrass	<i>Zoysia tenuifolia</i>

† Do not treat warm season turfgrass with Confront when the mowing height is less than 1/2 inch. Do not apply more than 1 pint of Confront per acre (0.37 fl oz or 2.5 tsp per 1000 sq ft) unless turfgrass injury can be tolerated. To minimize warm season turfgrass injury, additional applications should be made at least four weeks apart. Avoid swath overlaps. The use of this herbicide in the spring when warm season turfgrass is breaking dormancy may significantly delay green up of the turfgrass.

†† Do not apply Confront to Bermudagrass on sod farms.

Confront may discolor and/or stunt turfgrass that is not well established or is stressed or weakened due to unfavorable climatic conditions, temperature extremes, drought, nematodes, or other factors which damage or weaken turf. Apply Confront only to healthy, well-established turfgrass that has a well-anchored root system.

## General Use Precautions and Restrictions

Sale and use of this product in Suffolk and Nassau counties in New York State is prohibited.

In California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only.

**Do not** use on residential turf. Turfgrass and lawn uses are restricted to non-residential sites.

Do not apply to Bermudagrass on sod farms.

The use of this herbicide in the spring when warm season turfgrass is breaking dormancy may significantly delay green up of the turfgrass.

For ground application only.

Apply this product only as specified on this label.

**Application Restrictions:** 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.

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

**Do not** allow sprays of Confront to contact exposed suckers and/or roots of trees and shrubs or injury may occur.

This product can affect susceptible broadleaf plants directly through foliage and indirectly by root uptake from treated soil. **Do not** apply Confront directly to, or allow spray drift to come into contact with, 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.

**Do not** reseed for three weeks after application.

**Do not** use Confront on golf course putting greens or tees.

**Do not** send grass clippings to a compost facility.

**Do not** collect grass clippings for mulch or compost.

Applicator must give notice to landowners/property managers to not use grass clippings for composting.

**Do not** apply on ditches used to transport irrigation water.

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

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

**Do not** apply where runoff or irrigation water may flow onto susceptible crops as injury may result.

#### **Treatment of Turfgrass Species Not Listed on the Label for Confront**

Users who wish to use Confront on a turfgrass species not recommended on this label may determine the suitability for such uses by treating a small area at a recommended rate. Prior to treatment of larger areas, the treated area should be observed for any sign of herbicidal injury during 30 days of normal growing conditions to determine if the treatment is safe to the target species. **The user assumes the responsibility for any plant damage or other liability resulting from use of Confront on species not recommended on this label.**

#### **Preparing the Spray**

Add 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 agitation while spraying.

#### **Application Directions**

Make application using equipment that will insure uniform coverage (see specific application directions below). Sprays should be applied 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.

Apply 1 to 2 pints of Confront per acre to control broadleaf weeds. A maximum of 0.19 lb ae clopyralid/0.56 lb ae triclopyr per acre (2 pints of Confront per acre) per application is recommended. To minimize turfgrass injury, repeat applications, if required, should be made not less than 4 weeks apart.

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Newly seeded turf should be mowed 2 or 3 times before treating. Do not water for 6 hours after application.

**Restrictions:**

- Do not use more than 0.38 lb ae clopyralid/1.125 lb ae triclopyr per acre (4 pints of Confront per acre) per year of treatment.
- In Florida and New York, the maximum use rate is 0.25 lb ae clopyralid/0.74 lb ae triclopyr per acre (2 2/3 pints of Confront per acre) per growing season.
- **Do not** use on residential turf. Turfgrass and lawn uses are restricted to non-residential sites.
- **Do not** send grass clippings to a compost facility.
- **Do not** collect grass clippings for mulch or compost.
- Applicator must give notice to landowners/property managers to not use grass clippings for composting.
- In the states of **California, New York, Oregon and Washington**, turfgrass and lawn uses are restricted to golf courses only.

**Avoid overlapping of the spray pattern which could result in higher than recommended application rates. Rates above those recommended on this label could result in turf injury.**

**Avoiding Injurious Spray Drift**

Apply Confront in a manner to avoid contacting nearby susceptible crops or other desirable plants. 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 including ornamental trees and shrubs. Do not spray when the wind will carry spray mist toward susceptible crops or ornamental plants.

**Ground Application**

With ground equipment, spray 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 Application); by keeping the operating spray pressures at the manufacturer's minimum recommended pressures for the specific nozzle type used; and, by spraying when the wind velocity is low (follow state regulations). Avoid application under completely calm conditions which may be conducive to air inversion. In hand-gun applications, select the minimum pressure required to obtain adequate plant coverage without forming a mist. **Do not** apply with a mist blower.

**Standard Broadcast Application**

Apply 1 to 2 pints of Confront in enough water to deliver 20 to 200 gallons of total spray mix per acre (0.5 to 5 gallons spray per 1000 sq ft). Higher application volumes may be used when Confront is tank mixed with fertilizers.

**Low Volume Application**

Apply 1 to 2 pints of Confront in enough water to deliver from 5 to 20 gallons of total spray mixture per acre (1/8 to 1/2 gallon spray per 1000 sq ft). 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 a non-ionic surfactant 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 Turfgrass Using Portable Sprayers**

Mix 0.5 fl oz of Confront in enough water to make 1 gallon of spray and apply at any time broadleaf weeds are susceptible by wetting foliage of undesirable plants to point of runoff. This is enough spray to treat approximately 1000 sq ft of turf.

**Weeds Controlled and Use Rate Recommendations**

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Use the higher rates when hard to control species are prevalent, when applications are made in late summer on mature weeds, and during periods of drought stress.

Weeds	Suggested Use Rate		
	pt/acre	fl oz/1000 sq ft	tsp/1000 sq ft
black medic hop clover red clover white clover	1 <sup>†</sup>	0.37 (11 mL)	2.5
American burnweed 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 lambquarters narrowleaf plantain (buckhorn) shepherd's purse Virginia pepperweed	1.5 - 2	0.55 - 0.74 (16 - 22 mL)	3.5 - 4.5
Canada thistle common yellow woodsorrel <sup>†††</sup> creeping woodsorrel <sup>†††</sup> curly dock English lawn daisy <sup>††</sup> goldenrod lespedeza musk thistle poison ivy smartweed wild buckwheat wild violet <sup>†††</sup>	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.

<sup>†††</sup> Repeat treatment may be necessary.

### Crop Rotation Intervals

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

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**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. The field bioassay can be initiated at any time between harvest of the treated crop and the planting of the intended rotational crop. Observe the test crop for herbicidal activity, such as poor stand (effect on seed germination), chlorosis (yellowing), 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 below for which the rotational interval has clearly been met.

**Crop Rotation Intervals for All States Except Idaho, Nevada, Oregon, Utah and Washington**

**Note:** Numbers in parenthesis and <sup>†</sup> refer to footnotes following tables.

<b>Rotation Crops (1)</b>	<b>Rotation Interval <sup>†</sup></b> (Soils greater than 2% organic matter <b>AND</b> rainfall more than 15 inches during 12 months following application)	<b>Rotation Interval <sup>†</sup></b> (Soils less than 2% organic matter <b>AND</b> rainfall less than 15 inches during 12 months following application)
barley, field corn, grasses, oats, wheat	30 days	30 days
canola (rapeseed), flax, sugar beets	5 months	5 months
alfalfa, asparagus, cole crops, dry beans, grain sorghum, mint, onions, popcorn, safflower, soybeans, strawberries, sunflowers, sweet corn	10.5 months	18 months (2)
lentils, peas, potatoes (including potatoes grown for seed), and broadleaf crops grown for seed (excluding <i>Brassica</i> species)	18 months (2, 3)	18 months (2, 3)

1. A field bioassay is recommended prior to planting any broadleaf crops that are not listed. Do not rotate to unlisted crops prior to 10.5 months following application.
2. An 18-month crop rotation is recommended due to the potential for crop injury. **Note:** For these crops, a minimum 10.5-month rotation interval must be observed to avoid illegal residues in the harvested crop.
3. The potential for injury may be reduced by burning, removal, or incorporation of treated crop residues followed by a minimum of two supplemental fall irrigations.

**Crop Rotation Intervals for Idaho, Nevada, Oregon, Utah and Washington Only**

<b>Rotation Crops (1)</b>	<b>Rotation Interval <sup>†</sup></b> (Soils greater than 2% organic matter <b>AND</b> rainfall more than 15 inches during 12 months following application)	<b>Rotation Interval <sup>†</sup></b> (Soils less than 2% organic matter <b>AND</b> rainfall less than 15 inches during 12 months following application)
barley, field corn, grasses, oats, wheat	30 days	30 days
canola (rapeseed), flax, sugar beets	5 months	5 months

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asparagus, <i>Brassica</i> species grown for seed, cole crops, grain sorghum, mint, onions, popcorn, strawberries, sweet corn	12 months	12 months
alfalfa, dry beans, soybeans, sunflowers	12 months (2)	18 months (2)
lentils, peas, potatoes (including potatoes grown for seed), safflower, and broadleaf crops grown for seed (excluding <i>Brassica</i> species)	18 months (2)	18 months (2, 3)

1. A field bioassay is recommended prior to planting any broadleaf crops that are not listed. Do not rotate to unlisted crops prior to 12 months following application.
2. An 18-month crop rotation is recommended due to the potential for crop injury. **Note:** For these crops, a minimum 12-month rotation interval must be observed to avoid illegal residues in the harvested crop.
3. Crop injury and/or yield loss may occur up to 4 years after application. A field bioassay is also recommended prior to planting these sensitive crops. See instructions above.

<sup>†</sup> **Note:** The above intervals are based upon average annual precipitation, regardless of irrigation practices. Observance of recommended crop rotation intervals should result in adequate safety to rotational crops. However, Confront is dissipated in the soil by microbial activity and the rate of microbial activity is dependent upon several interrelating factors including soil moisture, temperature and organic matter. Therefore, accurate prediction of rotational crop safety is not possible. In areas of low organic matter (<2%) and less than 15 inches average annual precipitation, potential for crop injury may be reduced by burning or removing plant residues, supplemental fall irrigation and deep moldboard plowing prior to planting the sensitive crop.

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### Terms and Conditions of Use

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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.

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### Warranty Disclaimer

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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.

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### Inherent Risks of Use

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It is impossible to eliminate all risks associated with use of this product. Crop 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 Dow AgroSciences or the seller. All such risks shall be assumed by buyer.

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### Limitation of Remedies

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To the extent permitted by law, 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, Inherent Risks of Use, 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.

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EPA accepted 01/04/07



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308/2E  
August 10, 2007



Document Processing Desk (NOTIF)  
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CONFRONT (A.I. TRICLOPYR, CLOPYRALID)  
EPA REGISTRATION NUMBER: 62719-92  
NOTIFICATION OF MINOR LABEL CHANGE PER PR NOTICE 98-10

Enclosed please find labeling for the notification action of Confront<sup>®</sup> specialty herbicide. The following changes have been made by notification:

1. General Use Precautions and Restrictions: Revised the first statement underneath the heading to read "Sale and use of this product in Suffolk and Nassau counties in New York State is prohibited."
2. At the request of the state of New York, added that state to the sentence "In California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only." and the sentence "In the states of California, New York, Oregon and Washington, turfgrass and lawn uses are restricted to golf courses only."

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Contents of Submission**

- Transmittal document (this letter)
- Application for Pesticide, EPA Form 8570-1
- Label entitled Confront (R2A/Confront/Notif /08-10-07) (13 Pages plus Registration Notes) (5 Copies)

If you require further information, please contact Cindy Loy, Regulatory Specialist at (317) 337-4655 or Chris Hutchison, Registration Assistant for this product, at (317) 337-4976.

Sincerely,

John J. Jachetta, Ph.D.  
Regulatory Leader  
Regulatory Success - Americas  
(317) 337-4686  
(317) 337-4649 (FAX)

Enclosures

**NOTIFICATION**

**AUG 29 2007**