



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

FEB 17 1994

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SUBJECT: Label Amendment Submission of 08/17/93 in Response to PR Notice 93-7
EPA Reg. No. 62719-177
DOWELANCO BASAL HERBICIDE

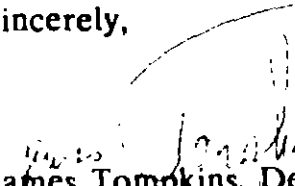
Dear Registrant:

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 When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted."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,


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



Recycled/Recyclable
Printed with Soy/Canola Ink on paper that
contains at least 50% recycled fiber

WPS Labeling (Language added to remove Turflon Amine from scope of WPS)

EPA text accepted 02/12/90

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.

62919-177

DowElanco Basal

Ready-to-Use Herbicide

For the Control of Woody Plants on Non-Crop Areas, Rangeland and Permanent Pastures, Non-Irrigation Ditch Banks, ~~Forests~~, and Wildlife Openings, Including Grazed Areas on These Sites

Active Ingredient(s):

Triclopyr (3,5,6-trichloro-2-pyridinyloxyacetic acid), Butoxyethyl Ester 16.7%

Inert Ingredient(s): 83.3%

Acid Equivalent: Triclopyr, 12.01% - 1 lb/gal

Contains petroleum distillates

E.P.A. Registration No. 62719-177

E.P.A. Est. 464-MI-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUCION:

PRECAUCION AL USUARIO:

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**HARMFUL IF SWALLOWED,
INHALED OR ABSORBED THROUGH
SKIN • CAUSES EYE IRRITATION**

Avoid Contact With Eyes, Skin, Or Clothing

**• Avoid Breathing Mists or Vapors • Avoid
Contamination Of Food • Wash Thoroughly
After Handling • Remove And Wash
Contaminated Clothing Before Reuse**

STATEMENTS OF PRACTICAL TREATMENT

In case of skin contact, flush skin with plenty of water. Get medical attention if irritation persists. If swallowed, do not induce vomiting. Call a physician. If in eyes, flush with plenty of water. Call a physician if irritation persists.

Physical or Chemical Hazards

**COMBUSTIBLE • Do Not Use or Store Near
Heat or Open Flame. Do Not Cut or Weld
Container.**

Environmental Hazards

This pesticide is toxic to fish. Keep out of lakes, ponds or streams. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water when disposing of equipment washwaters.

NOTICE

Read and understand the entire label before using. Use only according to label directions.

Before buying or using this product, read "WARRANTY LIMITATIONS AND DISCLAIMER" elsewhere on this label. If terms are not acceptable, return unopened package at once to seller for full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under WARRANTY LIMITATIONS AND DISCLAIMER.

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**

See Back Panel for Important Use Precautions.

BEST AVAILABLE COPY

WPS Revisions:

1. Deleted forest use from product label.
2. Added statement prohibiting use in forests.

DowElanco Basal

Do not apply this product in forests, including plants or plant materials grown for sale or research purposes.

GENERAL INFORMATION

DowElanco BASAL Herbicide is a ready-to-use product which is recommended for the control of unwanted woody plants through the use of basal bark application techniques in forests, rangeland and permanent pastures, and on non-crop areas including fence rows, non-irrigation ditch banks and around farm buildings. Use on these sites may include application to grazed areas as well as establishment and maintenance of wildlife openings.

Among the woody plant species controlled are:

Allanhus	Hercules Club	Olive, Russian
Alder, Red	Hickory,	Persimmon,
Ash, Green	Mockernut	Common
Ash, White	Hickory, Pignut	Pine, Jack
Aspen ^a	Honeylocust	Pine, Loblolly
Beech,	Hornbeam	Pine, Ponderosa
American	(Blue Beech)	Pine, Red
Birch, Black	Locust, Black ^a	Pine, White
Birch, Gray	Madrone, Pacific	Poison Ivy
Birch, Paper	Manzanita,	Poison Oak
Blackberry	Greenleaf	Poplar, Balsam
Black Locust	Maple, Mountain	Redcedar,
Blackgum	Maple, Red	Eastern
Boxelder	Maple, Silver	Sassafras ^a
Cherry, Black ^a	Maple, Sugar	Sumac, Smooth ^a
Cherry, Choke	Maple, Vine	Sumac,
Cherry, Pin	Mesquite ⁽¹⁾	Staghorn ^a
Cottonwood	Mountain-Laurel	Sweetgum
Dogwood,	Oak, Black ⁽¹⁾	Sycamore
Flowering	Oak, Blackjack ⁽¹⁾	Tamarack
Dogwood,	Oak, Chestnut	Tanoak
Red-Osier	Oak, Post ⁽¹⁾	Walnut
Elm, American	Oak, Red	Waxmyrtle
Galberry	Oak, Scarlet	Willow
Guava	Oak, Water	Yaupon
Hackberry	Oak, White	Yellow Poplar
Hazel	Olive, Autumn	

⁽¹⁾ Not recommended for streamline basal treatment.
^a Some resprouting may occur.

DIRECTIONS FOR USE
(Ready-To-Use, No Mixing Required)

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not use for manufacturing or formulating.

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

LOW VOLUME BASAL BARK TREATMENT: To control susceptible woody plants with stems less than 6 inches in basal diameter, apply DowElanco BASAL Herbicide with a backpack or knapsack sprayer using low pressure and a solid cone or flat fan nozzle. Spray the basal parts of brush and tree trunks in a manner which thoroughly wets the lower 12 to 15 inches of stems, including the root collar area, but not to the point of runoff. Herbicide concentration should vary with size and susceptibility of species treated. Apply at any time, including the winter months, except when snow or water prevent spraying to the ground line.

STREAMLINE BASAL BARK TREATMENT (Southern States): To control or suppress susceptible woody plants for conifer release only, apply DowElanco BASAL Herbicide with a backpack or knapsack sprayer using equipment which provides a directed straight-stream spray. Apply sufficient spray to one side of stems less than 3 inches in basal diameter to form a treated zone that is 6 inches in height. When the optimum amount of spray mixture is applied, the treated zone should widen to encircle the stem within approximately 30 minutes. Treat both sides of stems which are 3 to 4 inches in basal diameter. Direct the spray at bark that is approximately 12 to 24 inches above ground. Pines (loblolly, slash, shortleaf, and Virginia) up to 2 inches in diameter breast height (dbh) can be controlled by directing the spray at the point approximately 4 feet above ground. Best results are achieved when applications are

made to young vigorously growing stems which have not developed the thicker bark characteristic of slower growing, understory trees in older stands. This technique is not recommended for scrub and live oak species, including blackjack, turkey, post, live, blackjack and laurel oaks. Apply from approximately 6 weeks prior to hardwood leaf expansion in the spring until approximately 2 months after leaf expansion is completed. Do not apply when snow or water prevent spraying at the desired height above ground level.

TREATMENT OF CUT STUMPS: To control resprouting, apply undiluted DowElanco BASAL Herbicide to wet the area adjacent to the cambium and bark around the entire circumference and the sides of freshly cut stumps. Sides of stumps should be thoroughly wetted down to the root collar area, but not to the point of runoff. Treatments may be applied throughout the year, except when snow or water prevent spraying to the ground line. Control may be reduced with treatment during periods of moisture stress as in late summer. Stumps should be cut so that they are approximately level to facilitate uniform DowElanco BASAL Herbicide coverage.

NOTE: These treatment methods may be used to treat susceptible woody species on range and permanent pasture land provided that no more than 1.5 gallons of DowElanco BASAL Herbicide are applied per acre. Large plants or species requiring higher rates of DowElanco BASAL Herbicide may not be completely controlled.

USE PRECAUTIONS

Apply this product only as specified on this label.

Do not apply DowElanco BASAL Herbicide directly to, or otherwise permit it to come into direct contact with grapes, tobacco, vegetable crops, flowers or other desirable broadleaf plants and do not permit spray mists containing it to drift onto them.

AVOID INJURIOUS SPRAY DRIFT: Applications should be made only when there is little or no hazard from spray drift. 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 equipment, spray drift can be reduced by using spray pressures no greater than are required to obtain adequate coverage by using large droplet producing nozzle tips; and by spraying when wind velocity is low. Do not apply with nozzles that produce a fine droplet spray. Do not use a mistblower.

Do not apply on snow or frozen ground.

Untreated trees occasionally can be affected by movement of the herbicide through root grafting with the treated trees. Since this herbicide moves within the treated plant, do not use DowElanco BASAL Herbicide on parts of a multiple stem plant if injury to the untreated portions (cut or standing stems) cannot be tolerated.

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

Do not graze lactating dairy animals or harvest hay from treated areas for one year following treatment.

Do not graze areas treated with more than 1.5 gallons DowElanco BASAL Herbicide per acre for one year following treatment.

Withdraw livestock from forage treated with 1.5 gallons or less of DowElanco BASAL Herbicide at least 3 days before slaughter during the year of treatment.

STORAGE AND DISPOSAL

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

STORAGE: Store above 28°F or agitate before use.

DISPOSAL:
 Prohibitions - Open dumping is prohibited.

Pesticide Disposal - Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable federal, state, or local procedures.

Container Disposal - Triple rinse (or equivalent) with 10 drops or more of a liquid hand soap and water or an oil-based product such as kerosene or diesel fuel and spray residue on undesirable vegetation, in target area. Offer containers for recycling or reconditioning where allowed, or puncture and dispose of in a sanitary landfill, or by incineration if approved by state and local procedures.

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

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

WARRANTY LIMITATIONS AND 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 therein under normal conditions of use. THIS IS THE ONLY WARRANTY MADE ON THIS PRODUCT. NO OTHER EXPRESS AND NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE OUTSIDE OF THIS LABEL. Therefore, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), under abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes, etc.) or under conditions not reasonably foreseeable to or beyond the control of seller.

When buyer or user suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), buyer or user must promptly notify in writing DowElanco of any claims to be eligible to receive either remedy given below. The EXCLUSIVE REMEDY OF THE BUYER OR USER and the LIMIT OF LIABILITY of DowElanco or any other seller will be one of the following, at the election of DowElanco:

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

The seller will not be liable for consequential or incidental damages or losses.

The terms of this Warranty Limitations And Disclaimer cannot be varied by any written or verbal statements or agreements. Any employee or sales agent of the seller is not authorized to vary or exceed the terms of this Warranty Limitations And Disclaimer in any manner.

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