



62719-262

11/23/2001

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

NOV 23 2001

Subject: Turf Fertilizer Contains Confront*
EPA Reg. No. 62719-262
Amendment revising First Aid Statements and Warranty Disclaimer and adding
Terms and Conditions of Use section
OPP ID No. 286752
Your application dated September 17, 2001

Dear Dr. Peterson:

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

1. Add the following language in **bold typeface** on page 1 directly under "Turf Fertilizer contains Confront"

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

"Do not use grass clippings from turf treated with this product for mulch or for compost to be used in the growing season of application."

2. Move the Signal Word "Warning" to immediately below the child hazard warning statement.

3. Add the Signal Word "Warning" to the Precautionary Statements section immediately below the subheading "Hazards to Humans and Domestic Animals."

4. Remove the "Recommended for use by Professional Turfgrass managers" text on page 2.

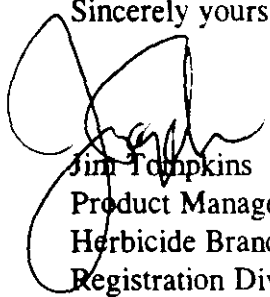
5. Move the section on page 3 listing weeds controlled at the regular and heavy rates to follow the section on spreader settings on page 6.

Page 2
EPA Reg. No. 62719-262

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

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

Sincerely yours,



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

Enclosure

(Front Panel of Label)

(logo) Dow AgroSciences

ACCEPTED
with COMMENTS
In EPA Letter Dated
NOV 23 2001

Turf Fertilizer Contains Confront*

- Selectively controls annual and perennial broadleaf weeds
- Provides a feeding of fertilizer

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 62719-262

Net Weight 34.21 lb (15.52 kg)

Keep Out Of Reach Of Children **WARNING**

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Substantial But Temporary Eye Injury • Harmful If Absorbed Through The Skin

Do not get in eyes or on clothing. Avoid contact with skin. Wear long-sleeved shirt and long pants, socks and shoes, goggles or face shield and chemical resistant gloves made of rubber or other waterproof material. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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.

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 on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for 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.

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 cleaning equipment or disposing of equipment washwaters.

Clopyralid is a chemical which can travel (seep or leach) through soil and under certain conditions contaminate ground water 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 over limestone bedrock, severely fractured surfaces, and substrates which could 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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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.**

(Front Panel of Label - Continued)

Turf Fertilizer Contains Confront*

ACTIVE INGREDIENTS:

triclopyr: 3,5,6 trichloro-2-pyridinyloxyacetic acid, triethylamine salt	0.50%
clopyralid: 3,6-dichloro-2-pyridinyloxyacetic acid, triethylamine salt.....	0.18%

INERT INGREDIENTS	99.32%
Total	100.00%

Acid Equivalent:

triclopyr -	0.36%
clopyralid -	0.12%

Guaranteed Analysis	
Total nitrogen (N)	XX%
X.X% ammoniacal nitrogen	
XX.X% urea, methylene ureas nitrogen	
X.X% water insoluble nitrogen	
Available phosphoric acid (P ₂ O ₅).....	X%
Soluble potash (K ₂ O)	X%
Derived from:	

EPA Reg. No. 62719-262

EPA Est. XXXX-XX-X

Product of USA

*Trademark of Dow AgroSciences LLC

[Editor's note: Registrant: Dow AgroSciences LLC • Indianapolis, IN 46268-1054]

Distributed by:
(Name and address of subregistrant)

Recommended for Use by Professional Turfgrass Managers

(Back Panel of Label)

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 before applying.

Storage and Disposal

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

Pesticide Storage: Store in original container in a clean, dry area away from extremes of heat and cold and out of direct sunlight.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office of guidance.

Container Disposal: Completely empty bag into application equipment. Then dispose of empty bag 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

This turf fertilizer product contains Confront herbicide which is a broad spectrum weed killer that will control broadleaf weeds in established cool season and warm season turfgrass.

Weeds Controlled by Turf Fertilizer Contains Confront

Apply Turf Fertilizer Contains Confront to moist or dry foliage at the NORMAL RATE (0.65 lb ai/A) to control the following weeds:

black medic	hop clover
bristly hawkbeard	narrow leaf plantain (buckhorn)
broadleaf plantain	red clover
catsear (coast dandelion)	white clover
common dandelion	
false dandelion	
hawkweed	

Note: Moist foliage application will provide quicker results. For best herbicide effect when applying to dry foliage, apply when good soil moisture conditions are present.

Apply Turf Fertilizer Contains Confront to moist foliage at the HEAVY RATE (0.75 lb ai/A) to control the following weeds.

creeping beggarweed	roundleaf mallow
dwarf beggarweed	sheep sorrel
burdock	sheepspurge
coffee weed	slender speedwell
common chickweed	smartweed
mouseear chickweed	spurweed
common cocklebur	Canada thistle
curly dock	musk thistle
dollarweed	old world diamond flower
English lawn daisy	common vetch
goldenrod	Virginia pepperweed
ground ivy	wild buckwheat
henbit	common yellow woodsorrel
lambquarters	creeping woodsorrel
lespedeza	prostrate spurge

matchweed	wild violet
poison ivy	Virginia buttonweed
common ragweed	

A repeat application may be needed for harder to control weeds in 4 to 6 weeks.

Turf Fertilizer Contains Confront is recommended for use on the following turf species:

Established Cool Season Turfgrasses

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

Established Warm Season Turfgrasses†

Common Name	Scientific Name
bahiagrass (Argentine or Pensacola)	<i>Paspalum</i> spp.
common Bermudagrass	<i>Cynodon dactylon</i> (common bermuda only)
buffalograss	<i>Buchloe dactyloides</i>
centipedegrass	<i>Eremochloa ophiuroides</i>
zoysiagrass	<i>Zoysia japonica</i>
zoysiagrass	<i>Zoysia tenuifolia</i>
fescue, tall (growing in warm season area)	<i>Festuca arundinaceae</i>

†Do not treat warm season turfgrasses with Turf Fertilizer Contains Confront when mowing height is less than 1/2 inch.

Do not use Turf Fertilizer Contains Confront on golf course putting greens and tees.

Turf Fertilizer Contains Confront may discolor and/or stunt turf 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 Turf Fertilizer Contains Confront only to healthy, well-established turf that has a well-anchored root system.

Common bermudagrass, centipedegrass, zoysiagrass, and bahiagrass may be temporarily discolored by Turf Fertilizer Contains Confront.

Do not apply Turf Fertilizer Contains Confront to bentgrass; hybrid bermudagrass varieties such as Tifway, Tifdwarf, and Tifgreen; St. Augustinegrass; and ground covers such as lippia.

On bahiagrass and centipedegrass, do not apply before mid-March or until after the second mowing of the year. In the Fall, do not treat centipedegrass after the first of October or bahiagrass after the first November.

Application Directions

Make application using equipment that will ensure uniform coverage. Application should be made when weeds are actively growing. Good soil moisture conditions should be present before application to achieve optimal results. Application under drought conditions may provide less than desirable results.

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Broadleaf weed species germinate at different times. Only emerged weeds present at time of application are controlled.

Additional applications should not be made less than 4 weeks apart to minimize grass injury. Newly seeded turf should be mowed 4 times before being treated.

Application Precautions and Restrictions

Apply this product only as specified on this label.

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

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.

Entry Restrictions: Do not enter or allow others to enter the treated area until dusts have settled.

Do not contaminate feed or foodstuffs.

Do not contaminate water used for irrigation or domestic purposes.

Do not graze treated areas. Do not feed clippings to livestock.

Do not apply Turf Fertilizer Contains Confront directly to, or otherwise permit it to come into direct contact with vegetables, flowers, fruit or ornamental trees, cotton, grapes, tobacco, or other nontarget broadleaf plants.

Do not apply when weather conditions favor drift from target areas. Drift or runoff may adversely affect nontarget plants.

Do not apply to exposed roots of shallow rooted trees and shrubs and allow to contact exposed suckers or injury may occur.

Do not reseed until 4 weeks after application.

Do not apply at greater than recommended rates, especially under the branch spread (dripline) of trees.

Do not use grass clippings from turf treated with Turf Fertilizer Contains Confront for mulch.

Do not use compost containing grass clippings from turf treated with Turf Fertilizer Contains Confront in the growing season of application.

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.

Do not seed, sod, or sprig after application. Delay until no sooner than 4 weeks after application.

Treatment of Turf Species Not Listed on the Confront Fertilizer Label

Users who wish to use Confront on turf 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 the use of Confront on species not recommended on this label.

Suggested Spreader Settings

To provide proper distribution, calibrate spreader before application.

34.21 lb treats 11,000 ft at the NORMAL RATE (0.9 lb N/M) 0.65 lb ai/A
 34.21 lb treats 9,529 ft at the HEAVY RATE (1.04 lb N/M) 0.75 lb ai/A

<u>SPREADER</u>	<u>GROUND SPEED</u>	<u>WIDTH OF COVERAGE</u>	<u>SPREADER SETTINGS</u>	
			<u>(lb product/acre)</u>	
			<u>NORMAL RATE</u>	<u>HEAVY RATE</u>
			<u>135.5</u>	<u>156.4</u>
Scotts Drop Type	3 mph	overlap wheels	X	X
Gandy	3 mph	overlap wheels	X	X
Scotts Rotaries				
R-7†, R-7X†	3 mph	X feet	X	X
R-8 (cone X)	3 mph	X feet	X	X
Lely models				
(see below)	4.5 mph	XX feet	X	X
Vicon (Model 02)	4.5 mph	XX feet	X	X
Vicon (Model 03)	4.5 mph	XX feet	X	X

†For the R-7X model, use with adjustable pattern slide 1/4 closed.

Lely models WTR, WFR, HR, and 1250. PTO at 450 rpm.

IMPORTANT NOTICE: DISCLAIMER AND LIMITATION OF LIABILITY

Terms and Conditions of Use

If terms of the following Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under Warranty Disclaimer, Inherent Risks of Use and Limitations of Remedies.

Warranty Disclaimer

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

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Seller. All such risks shall be assumed by Buyer.

Limitation of Remedies

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

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

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

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

*Trademark of Dow AgroSciences LLC
EPA-Accepted ___/___/___