

71368-5

10/21/2010

1 of 6



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Matthew P. Granahan
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

OCT 21 2010

Dear Mr. Granahan:

SUBJECT: Label Amendment
Revised Basic and Alternate Confidential Statements of Formula (CSF)
Thistrol Herbicide
EPA Registration No. 71368-5
Your Application Dated June 2, 2010

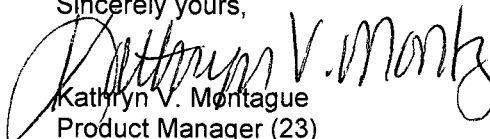
The label amendment referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Under the "First Aid" statements, the "If Swallowed" statement should appear as the second statement.
2. Add "Harmful if swallowed." as the second sentence in the "Hazards to Humans and Domestic Animals" area.
3. A "Note to Physician" statement is not required and may be deleted.
4. On page 3, in the heading "General Information", delete the word "General" and replace with "Product".
5. In the "PPE Section" add the following:
 - a. "Applicators and all mixers, loaders..."
 - b. "shoes plus socks"
 - c. "chemical resistant gloves"

A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment. This amended labeling supersedes all previously accepted ones.

The Basic Confidential Statement of Formula, dated May 10, 2010 is acceptable. It supersedes the current basic CSF dated February 6, 2008. A copy has been placed in the files as part of the record. The alternate CSF, dated February 6, 2008 is not acceptable. It is a 100% repack of EPA Registration No. 15440-28, however, it is not acceptable due to different toxicological properties and signal word.

Sincerely yours,


Kathryn V. Montague
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Enclosure

2016

Thistrol® Herbicide

ACCEPTED
with COMMENTS
In EPA Letter Dated:
OCT 21 2010

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

71368-5

CONTROLS OR SUPPRESSES CANADA THISTLE AND
CERTAIN OTHER BROADLEAFWEEDS IN PEAS AND MINT
CONTAINS MCPB

ACTIVE INGREDIENT:

Sodium salt of 4-(2-Methyl-4-chlorophenoxy) butyric acid*	23.5%
OTHER INGREDIENTS:	76.5%
TOTAL:	100.0%

*4-(2-Methyl-4-chlorophenoxy) butyric acid equivalent to 21.4% by weight or 2 pounds per gallon.

KEEP OUT OF REACH OF CHILDREN

WARNING / AVISO

PRECAUCION AL USUARIO: 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.)

SEE INSIDE BOOKLET FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

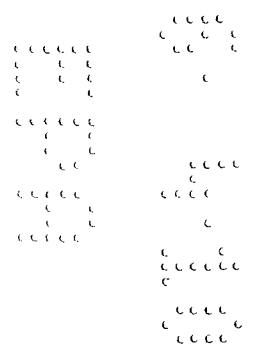
EPA REG. NO. 71368-5
EPA EST. NO.

Manufactured For
NUFARM, INC.
150 Harvester Drive
Burr Ridge, IL 60527



NET CONTENTS Gals. (L)

071368-0005.20100415.EPA_A



**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING / AVISO**

Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Avoid contact with skin. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Mixers, loaders and other handlers must wear protective eyewear, long-sleeved shirt, long pants when mixing, loading or exposed to the concentrate.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS STATEMENTS:

Pilots must use an enclosed cockpit that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(6)].

USER SAFETY RECOMMENDATIONS	
Users Should:	
<ul style="list-style-type: none"> • Wash with plenty of soap and water before eating, drinking, chewing gum, using tobacco or using the toilet. • Remove clothing/PPE 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	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • 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 the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIANS
Probable mucosal damage may contraindicate the use of gastric lavage.

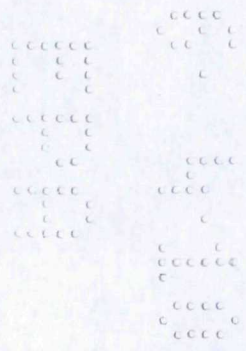
ENVIRONMENTAL HAZARDS

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. Avoid spray drift as this product may injure susceptible crops and plants such as cotton, beans, grapes, tomatoes, and ornamentals. (Coarse sprays are less likely to drift.) Do not use same spray equipment for other purposes unless thoroughly cleaned prior to use. Do not apply this product through any type of irrigation system.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label before using this product.

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 intervals. 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 24 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, shoes plus socks, and chemical-resistant gloves made of any waterproof material.

GENERAL INFORMATION

This product will provide safe and effective post-emergence control or suppression of Canada thistle in field peas. This product will also provide control or suppression of several annual broadleaf weeds such as common lambsquarters, pigweed, smartweed, sowthistle, and morningglories. Canada thistle is a particularly troublesome weed in pea fields, because it can reduce pea yields through competition, and because flower buds of the weed are difficult to remove from the harvested crop, resulting in loss of crop quality and reduced cash value to the grower.

This product will also provide suppression of field bindweed and other broadleaf weeds in mint that are listed on this label.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles. A variety of factors including weather conditions (e.g., wind direction, wind speed, temperature, relative humidity) and method of application (e.g., ground, aerial) can influence pesticide drift. The applicator and grower must evaluate all factors and make appropriate adjustments when applying this product.

WIND SPEED: Do not apply at wind speeds greater than 10 mph at the application site.

DROPLET SIZE: Apply as a medium or coarser spray (ASAE standard 572).

RELEASE HEIGHT (Ground Application): Apply using a nozzle height of no more than 4 feet above the ground or crop canopy.

RELEASE HEIGHT(Aerial Application): Do not release spray at a height greater than 10 feet above the ground or crop canopy.

MINT

For suppression of field bindweed (*Convolvulus arvensis*) and other broadleaf weeds listed on this label: Apply early post-emergence at the rate of 1 to 2 pints per acre (0.25 to 0.5 lb. acid equivalent/acre (lb. ae/A)) in sufficient water for coverage.

Do not harvest the mint within 40 days of the application.

Field bindweed suppression improves as the runners begin to exceed 6 to 8 inches in length. Mint oil yields may be reduced if applications are made when the crop is 6 inches or more tall. Mint may be discolored or twisted, but the production benefits gained from suppressing bindweed typically far exceeds the risk of mint injury.

For control of winter annual weeds listed, a fall application at 1 to 2 pints per acre (0.25 to 0.5 lb. ae/A) may be applied. A single spring application works best for field bindweed suppression.

If tank mixed with other herbicides, test on a small area prior to full application (as the tank mixed application may result in significant damage to the mint).

Attention: Do not use this product if minor mint injury is unacceptable.

PEAS

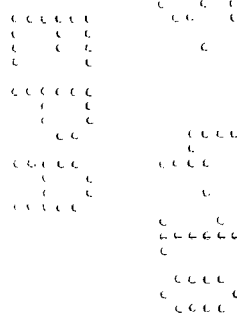
MIXING AND HANDLING INSTRUCTIONS

Fill the spray tank 1/2 to 3/4 full with clean water. Begin agitation and add the recommended amount of this product. Add water to the spray tank to the desired level. Maintain sufficient agitation to ensure a uniform spray mixture during application. For ground application, apply in 20 to 40 gallons of water per acre, using a maximum spray pressure of 40 psi. For aerial application, apply in 5 to 10 gallons of water per acre.

INSTRUCTIONS FOR APPLYING THIS PRODUCT

Peas are tolerant to this product from shoot emergence until about 3 leaf nodes before flowering. Typically, pea plants have developed 6 to 12 nodes at the normal time of Canada thistle treatment. Do not apply this product later than 3 nodes before pea flowering or after pea flower buds appear, as yield may be adversely affected. Most pea varieties may be safely sprayed with this product, however, temporary twisting of some pea varieties may follow application. Check with state weed extension specialist or local canning company representatives.

When using the tank mixture of this product plus BASAGRAN®, observe the more restrictive of the two labels for directions, precautions or limitations.



**RATES FOR APPLYING THISTROL AND
THISTROL + BASAGRAN TANK MIXTURES TO PEAS**

Weed Species	THISTROL 2 to 3 pints		THISTROL 3 to 4 pints		THISTROL 4 to 6 pints		THISTROL 2 pints + BASAGRAN 1 pint		THISTROL 3 pints + BASAGRAN 1-1/2 pints	
	MAX LEAF STAGE	MAX WEED HEIGHT	MAX LEAF STAGE	MAX WEED HEIGHT	MAX LEAF STAGE	MAX WEED HEIGHT	MAX LEAF STAGE	MAX WEED HEIGHT	MAX LEAF STAGE	MAX WEED HEIGHT
Common Lambsquarters	2 - 3	3"	3 - 4	3" - 4"	4 - 5	4" - 5"	4	2"	8	3"
Pigweed	2 - 3	3"	3 - 4	3" - 4"	4 - 5	4" - 5"	5	2"	8	6"
Smartweed	2 - 3	3"	3 - 4	3" - 4"	4 - 5	4" - 5"	6	4"	8	6"
Morningglory	2 - 3	3"	3 - 4	3" - 4"	4 - 5	4" - 5"	-	-	-	-
Sowthistle	2 - 3	3"	3 - 4	3" - 4"	4 - 5	4" - 5"	4 - 5	4" - 5"	4 - 5	4" - 5"
Canada Thistle	-	-	-	4" - 10"	-	4" - Bud	-	4" - Bud	-	4" - Bud
Cocklebur	-	-	-	-	-	-	-	-	6	6"
Common Purslane	-	-	-	-	-	-	4	1"	6	2"
Common Ragweed	-	-	-	-	-	-	-	-	6	3'
Field Pepperweed	-	-	-	-	-	-	6	4"	10	8"
Giant Ragweed	-	-	-	-	-	-	-	-	4	6"
Henbit	-	-	-	-	-	-	-	-	4	2"
Jimsonweed	-	-	-	-	-	-	4	4"	6	6"
Marshelder	-	-	-	-	-	-	-	-	4	2"
Prickly Sida	-	-	-	-	-	-	6	3'	8	4"
Shepherdspurse	-	-	-	-	-	-	6	4"	10	8"
Velvetleaf	-	-	-	-	-	-	-	-	4	2"
Wild Mustard	-	-	-	-	-	-	6	4"	10	10"
Wild Radish	-	-	-	-	-	-	6	4"	10	10"
Wild Sunflower	-	-	-	-	-	-	-	-	4	5"

RESTRICTIONS AND PRECAUTIONS

- Do not spray peas under moisture stress.
- Do not spray peas when the air temperature exceeds 90°F.
- Do not spray peas later than 3 nodes before pea flowering or after pea flower buds appear.
- Do not exceed the maximum recommended rate of this product listed on this label.
- Do not feed treated peas or pea vines to livestock.

