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

APR 30 2004

OFFICE OF
PREVENTION, PESTICIDES
AND
TOXIC SUBSTANCES

Ms. Marie A. Maks
Nichino America, Inc.
4550 New Linden Hill Road
Suite 501
Wilmington, DE 19808

Dear Ms. Maks:

Subject: Label Revision Amendment - New Use On Wheat
ET™ Herbicide/Defoliant
EPA Registration No. 71711-7
Your Amendment Application Submission Dated
April 2, 2004

The labeling, referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is conditionally acceptable provided that you:

1. Submit, within three (3) years from the date of this letter, the following required data to satisfy the conditional data requirements on wheat:
 - a. Fourteen (14) additional confirmatory field trials (5 on winter planted wheat and 9 on spring planted wheat) using the ET emulsifiable concentrate formulation are needed from the remaining major wheat growing areas as specified in "Residue Chemistry Test Guidelines, OPPTS 860.1500, Crop Field Trial".

NOTE: No quantifiable residues were reported in wheat grain at the 5X application rate. This conclusion may change, if the requested field trials data results in measurable residues in wheat grain. If measurable residues are reported in the additional requested wheat field residue studies, a wheat processing study will be required.

2. Submit a separate copy of a detailed description of the methodology used to quantify residues of pyraflufen-ethyl and E-1 (measured as E-15, the methyl ester of E-1) for this tolerance request without confidentiality claims. The results for E-15 should be calculated in terms of parent compound. Once the separate detailed description of the methodology is received and

accepted, it will be sent to FDA for inclusion in PAM II as a lettered method.

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3. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
 - a. Under the heading entitled "ENVIRONMENTAL HAZARDS," delete the following duplicate statement within the paragraph: "Do not contaminate water when disposing of equipment washwater or rinsate."
 - b. Within the Agricultural Use Requirement box, revise the restricted entry interval (REI) of "24 hours" to read as "12 hours". The registrant has provided data to support the reduction of the REI and the Agency has concurred.
 - c. Under the heading entitled "USE RESTRICTIONS," the maximum application of this product to field corn, soybeans, or wheat (limited to preplant burndown) is 2 fluid ounces per acre.
 - d. Under the heading entitled "Noncrop land and uncultivated agricultural..." within the subsequent paragraph, please remove and delete the following statement: "ET herbicide may be applied after the harvest of any crop to control late emerging broadleaf weeds or in tank mixtures with glyphosate or other grass herbicides for broad spectrum weed control (see below)." The statement implicates the intention to cultivate agricultural crops within areas designated as terrestrial non-crop land.
 - e. Incorporate into your product labeling the following aerial drift reduction advisory information:

INFORMATION ON DROPLET SIZE: The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

CONTROLLING DROPLET SIZE:

Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

Pressure - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

Number of nozzles - Use the minimum number of nozzles that provide uniform coverage.

Nozzle Orientation - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.

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Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Maintenance of Nozzles - periodic inspection and subsequent replacement of nozzles to ensure proper chemical application is recommended.

BOOM LENGTH: For some use patterns, reducing the effective boom length to less than 3/4 of the wingspan or rotor length may further reduce drift without reducing swath width.

APPLICATION HEIGHT: Applications should not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

SWATH ADJUSTMENT: When applications are made with a crosswind, the swath will be displaced downward. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.)

WIND: Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

TEMPERATURE AND HUMIDITY: When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

TEMPERATURE INVERSIONS: Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

SENSITIVE AREAS: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

- f. There is a typographical error noted in the table on page 8. Under the column entitled "Pest," please revise "Broadeaved weeds" to read as "Broadleaved weeds".
4. Please submit one (1) final printed copy of the referenced label, incorporating the above change, before releasing the product for shipment.

A stamped copy is enclosed for your records. The amended labeling supercedes all previously accepted ones. If you have any concerns or questions regarding this letter, please call Marcel Howard at (703)305-6784.

Sincerely yours,

/s/

Joanne I. Miller
Product Manger (23)
Herbicide Branch
Registration Division (7505C)

Enclosures

ET® Herbicide/Defoliant

For Use on Cotton, Potatoes, Field Corn, Soybeans, Wheat,
Noncrop Land and Uncultivated Agricultural Areas, and Noncrop Weed Control
(NOT FOR HOMEOWNER USE)

Active Ingredient:

Pyraflufen ethyl (ethyl 2-chloro-5-(4-chloro-5-difluoromethoxy-1-methyl-1H-pyrazol-3-yl)-4-fluorophenoxyacetate 2.5%

Other Ingredients: 97.5%

Total: 100.0%

Contains 0.208 lb. pyraflufen ethyl per gallon (25 grams per liter)

EPA Reg. No. 71711- 7

EPA Est. No.

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 to you in detail.)

FIRST AID	
If swallowed	<ul style="list-style-type: none"> Call a doctor or poison control center 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. Avoid alcohol.
If in eyes	<ul style="list-style-type: none"> Immediately 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	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
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 mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
HOTLINE 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 1-800-348-5832 for emergency medical treatment information. In case of fire or spills, information may be obtained by calling 1-800-424-9300.	
NOTE TO PHYSICIAN	
Contains petroleum distillate – vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.	

For product information use internet website www.nichino.net

See (back, side, inside) label for First Aid and Precautionary
Statements and attached booklet for complete Directions for Use

Net Contents: _____

Active Ingredient Made in Japan; Formulated and Packaged in U.S.A.

Nichino America, Inc.

4550 New Linden Hill Road, Suite 501

Wilmington, DE 19808

www.nichino.net

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 30 2004**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

71711-7

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER - PELIGRO**

Corrosive. Causes irreversible eye damage. Do not get in eye, on skin, or on clothing. Wear goggles or face shield when handling. Harmful if swallowed. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical resistant (such as nitrile or butyl) gloves
- Shoes plus socks
- Protective eyewear
- For overhead exposure, wear chemical resistant headgear

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. 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

ENGINEERING CONTROLS STATEMENTS

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.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. This product may contaminate water through drift of spray in wind or via runoff events. Use care when applying in areas adjacent to any body of water. 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 washwater or rinsate. Do not apply when weather conditions favor drift from treated areas. Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply if rainfall is expected within one hour.

SPRAY DRIFT

Avoid spray drift to all other crops and nontarget areas. Do not apply when weather conditions may cause drift. Do not allow this product to drift onto nontarget areas. Drift may result in illegal residues or injury to adjacent crops and vegetation, in the form of leaf yellowing and defoliation. To avoid spray drift, DO NOT apply aerially when wind speed is greater than 10 mph or during periods of temperature inversions. Use of larger droplet size will also reduce spray drift.

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR.

The interaction of equipment and weather-related factors determines the potential for spray drift. The applicator is responsible for considering all these factors when making decisions. Droplet size, boom height, and wind speed are the primary factors determining drift. The specific application conditions required for the use of this product are described below.

DIRECTIONS FOR USE

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

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 interval. 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
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

NONAGRICULTURAL 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, or greenhouses. For other uses including interiorscapes and other nonagricultural uses, do not enter treated areas without protective clothing until sprays have dried.

GENERAL INFORMATION

ET® is designed for use as a harvest aid in cotton and potatoes; as a preplant or preemergence burn-down in field corn, cotton, soybeans, and wheat; postemergence use in cotton; postemergence layby in cotton; for weed control in noncrop land and uncultivated agricultural areas (nonfood producing) and; and as a nonselective herbicide for control of broadleaf weeds in noncrop areas. The contents should be mixed in water, using sufficient volume to permit thorough coverage of crop foliage and stems and applied using broadcast spray techniques. ET is rainfast within one hour after application.

Only certified applicators are permitted to apply ET for turf and ornamental sites.

USE RESTRICTIONS

- Do not apply more than 8.5 fl oz/acre per growing season to cotton, or 11 fl oz/acre per growing season to potatoes.
- Do not apply more than 1 fl oz/acre to field corn, soybeans, or wheat, prior to planting, or emergence of crop only.
- Do not apply within 7 days of harvesting cotton or potatoes.
- **Do not apply this product through any type of irrigation system.**

WEEDS CONTROLLED

The following broadleaf weed species can be controlled by applications of ET in the manner described below at 3 to 6 inches tall. Tankmixes of ET with other herbicides may be needed for control of larger weeds:

Annual sowthistle	Lambsquarters
Bedstraw	Morningglory, entireleaf
Black nightshade	Morningglory, ivyleaf
Chickweed	Morningglory, pitted
Cocklebur	Tall waterhemp
Common purslane	Pennsylvania smartweed
Common ragweed	Prostrate knotweed
Common sunflower	Redroot pigweed
Curly dock	Russian thistle
Cutleaf evening primrose	Shepherdspurse
Hairy beggartick	Velvetleaf
Hemp sesbania	Wild buckwheat
Henbit	Wild mustard
Kochia	Wild radish
Ladysthumb	

MIXING DIRECTIONS

Add ½ to ¾ of the required amount of water to the spray tank. Start agitation. Add the required amount of ET and the remaining amount of water. Mix only as much spray solution as can be sprayed within four hours. Storage and use of the previous day's spray mix may result in reduced activity.

TANK MIXTURES

ET may be applied as a tankmix or in sequential application with other harvest aid, fungicide, or insecticide products. Weather, crop conditions, or the presence of certain weeds, crop damaging insects, or diseases will indicate the inclusion of other pesticides in the defoliation or desiccation application. ET may be tank mixed or applied in sequence with other defoliant or desiccant products such as Cottonquik®, Cyclone®, DEF® 6, Diquat, Dropp® 50WP, Finish®, Folex® 6EC, Ginstar®, Gramoxone®, Prep™, Roundup®, or Starfire®. ET may also be tank mixed with various insecticides or fungicides. Read and follow all label directions for each tankmix product.

EQUIPMENT CLEANING

Do not allow the spray solution to dry in the application equipment. After application and before using the sprayer equipment for any other applications, the sprayer must be thoroughly cleaned. Applicators must ensure proper equipment clean-out for any other products mixed with ET as provided on the other product label(s). Immediately following application, clean all equipment thoroughly with detergent or a spray tank cleaner and water as described below. Should residues of ET remain in inadequately cleaned equipment, they may be released in subsequent applications and cause injury to crops.

1. Drain sprayer tank, hoses, and spray boom and thoroughly rinse with clean water the inside of the spray tank, sprayer hoses, boom, and nozzles to remove any sediment or residues.
2. Fill the tank ½ full with clean water, add the appropriate detergent (follow manufacturer's directions for use). Fill tank to capacity and operate the sprayer with agitation for 15 minutes to flush hoses, boom, and nozzles.
3. Drain the sprayer tank, lines, and booms. Rinse the tank with clean water and flush through the hoses, boom, and nozzles. Remove and clean spray nozzles, tips, and screens.
4. Dispose of all cleaning solutions, rinsate, and washwaters in accordance with Federal, state, and local regulations.

APPLICATION AND DOSAGE

Cotton Defoliation

When applied as a foliar spray to cotton preharvest, ET provides fast, effective defoliation of cotton plants. Adequate defoliation is generally achieved within 7 to 14 days dependent on temperature and weather conditions. Apply ET when sufficient mature bolls have developed to produce the desired yield (generally 50% to 70%). Consult university recommendations for your region for testing of boll maturity. Apply using aerial or ground equipment at the rates specified in the dosage table (below) for your area when conditions are favorable for defoliation. If aerially applied, use fixed wing aircraft only. A repeat application may be made 7 days later, if required. Spray volume should be 20 to 30 gallons per acre for ground applications and **at least 5 gallons per acre for aerial applications.**

Cotton Variety	Rate and Spray Volume	Use Restrictions and Comments
Upland and stripper varieties	1.5 to 2 fl oz/A in 5 gpa by air or 20 to 30 gpa using ground equipment	Make 1 to 2 applications as needed for adequate defoliation. Do not exceed two applications, or 5.5 fl oz/A for defoliation of cotton.
Acala varieties	2.75 fl oz/A in 5 gpa by air or 20 to 30 gpa using ground equipment	Do not apply within 7 days of harvest.

Postemergence Weed Control

Apply to emerged weeds in cotton having less than 3 inches of barked stem **using hooded ground spray equipment only**. Use of nonhooded spray equipment may allow spray to contact non-barked stem and may cause girdling of plants, crop damage, and/or loss of yield. ET may be tank mixed with other herbicides, such as glyphosate, diuron, or MSMA for control of grassy weeds.

Crop	Rate and Spray Volume	Use Restrictions and Comments
Cotton (with < 3 inch barked stem)	1 to 2 fl oz/A, in 20 to 30 gpa using ground equipment	Apply using hooded spray equipment only to avoid crop damage . Do not exceed 2 fl oz/A per season for this use pattern.
	0.5 to 1 fl oz/A in tank mixtures with glyphosate or other grass herbicide	

Postemergence Layby

For best results, use ET herbicide in a tank mixtures with other labeled herbicides for control of annual or perennial herbaceous broadleaf and grass weeds less than 6" in height, or rosettes less than 3" in diameter. If grassy weeds are present, use ET herbicide in tank mixtures with glyphosate or MSMA. For broadleaf weed control use mixtures of ET with glyphosate, diuron or other labeled products. Thorough, uniform spray coverage is essential for good control. This tank mixture may be applied as a late postemergence treatment when the cotton crop has attained an average height of 18 inches or more than 3 inches stem bark development at the base of the plant. **Avoid contact of the herbicide with desirable vegetation**. ET herbicide and tank mixtures may be used in place of tillage for weed control.

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Cotton, (with 3" or more of barked stem)	Broadleaves and grass weed species	0.5 to 1.0 fl oz/A in tank mixture with 0.65 to 1.3 lb ae/A (16-32 fl oz.) glyphosate in 10 to 30 gallons water per acre. Or MSMA or diuron (ae-acid equivalent)	Use the higher rate and spray volumes for control of larger weeds (4-6" tall). Weeds larger than 6" tall may not be controlled. Do not apply more than 1 fl oz/A per season with this use pattern. Allow a minimum of 30 days between preplant burndown application of ET herbicide and postemergence application. For crops not listed on this label, applications must be made at least 30 days prior to planting. For tank mixtures, refer to each product label for crop rotation restrictions, mixing directions, and precautionary statements. Always use in accordance with the most restrictive product label.

Potato Desiccation

When applied as a foliar spray to potatoes in early stages of senescence, **ET** provides effective desiccation of potato foliage and vines, as well as control of troublesome late-season broadleaf weeds to facilitate tuber harvest. Adequate desiccation is generally achieved within 14 days after the initial treatment is applied. A repeat application of **ET** or another herbicide or desiccant may be needed under certain climatic conditions to ensure complete desiccation. Apply **ET** when the potato crop is in the early stages of natural senescence for best results.

Crop	Rate and Spray Volume	Use Restrictions and Comments
Potato (all varieties)	2.75 to 5.5 fl oz/A in 5 gpa by air or 20 to 50 gpa using ground equipment	Make 1 to 2 applications using ground equipment at a minimum 7 day interval. Do not exceed two applications or 11 fl oz/A for potato desiccation. Do not apply within 7 days of harvest.

Field Corn, Soybeans, Wheat, Cotton, (Limited to Preplant Burndown)

For best results, use ET herbicide for control of annual or perennial herbaceous broadleaf weeds less than 4" in height, or rosettes less than 3" in diameter. Thorough, uniform spray coverage is essential for good control. ET herbicide may be applied preplant burndown in cereal crops, peanuts, rice, sorghum, and sugarcane to control broadleaf weeds or in tank mixtures with glyphosate or other grass herbicides for broad spectrum weed control (see below).

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Field corn Cotton Soybeans Wheat	Broadleaves	0.5 to 2.0 fl oz/A plus Weedmaster®, 2,4-D, or dicamba in a minimum of 5 gpa by air or 10 gallons water per acre*	Use the higher rate and spray volumes for control of larger weeds (4-6" tall). Weeds larger than 6" tall may not be controlled. Allow a minimum of 30 days between applications. Treated areas may be replanted immediately with any crop listed on this label.
	Grasses and Broadleaves	0.5 to 1.0 fl oz/A plus registered glyphosate product in a minimum of 5 gpa by air or 10 gallons water per acre	Do not plant any other rotational food crops for 30 days after the last application of ET. For tank mixtures, refer to each product label for crop rotation restrictions, mixing directions, and precautionary statements. Follow the crop rotation statements on the tankmix product if they are more restrictive. Do not allow livestock to graze in treated areas. Do not apply more than 2 fl oz/A for this use.

* use higher rates for hard to control weeds such as Canada thistle, field bindweed, and kochia

Noncrop land and uncultivated agricultural areas (nonfood producing) such as soil bank lands, barrier strips, farmyards, fence rows, rights-of-way, or fuel storage areas

ET herbicide may be used in tankmixes with other herbicides to control broadleaf and grassy weeds in noncrop situations. For best results, use ET herbicide for control of annual or perennial herbaceous broadleaf weeds less than 4" in height, or rosettes less than 3" in diameter. Thorough, uniform spray coverage is essential for good control. ET herbicide may be applied after the harvest of any crop to control late emerging broadleaf weeds or in tank mixtures with glyphosate or other grass herbicides for broad spectrum weed control (see below).

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Noncrop lands and uncultivated agricultural areas	Broadleaved weeds	0.5 to 2.0 fl oz/A plus Weedmaster®, 2,4-D, or dicamba in a minimum of 5 gpa by air or 10 gallons water per acre by ground*	<ul style="list-style-type: none"> ▪ Use the higher rate and spray volumes for control of larger weeds (4-6" tall). Weeds larger than 6" tall may not be controlled. ▪ Do not make more than 3 applications or exceed 5.5 fl oz/A per year for this use. Allow a minimum of 30 days between applications. ▪ For crops not listed on this label, applications must be made at least 30 days prior to planting. ▪ For tank mixtures, refer to each product label for crop rotation restrictions, mixing directions, and precautionary statements. Follow the crop rotation statements on the tankmix product if they are more restrictive. ▪ Do not allow livestock to graze in treated areas.
	Grasses and Broadleaved weeds	0.5 to 1.0 fl oz/A plus registered glyphosate product in a minimum of 5 gpa by air or 10 gallons water per acre by ground*	

* use higher rates for hard to control weeds such as Canada thistle, field bindweed, and kochia

Noncrop Weed Control

For use in noncrop areas where control of weeds is desired, such as airports; commercial plants; storage and lumber yards; barrier strips and firebreaks; equipment areas; nurseries and ornamental plantings; sod farms; Christmas trees; established ornamental turf; railroad, roadside and utility rights-of-way; fuel tank farms and pumping stations; other similar industrial noncrop areas. **Not for homeowner use.**

- For applications to ornamental turf and plantings, do not allow people (other than the applicator) or pets on treatment area during application and until sprays have dried (refer to Nonagricultural Use Requirements box). Apply **ET** at rates specified in the dosage table below for control of broadleaf weeds. **ET** may be tank mixed with other broadleaf herbicides such as glyphosate for control of grassy weeds. **ET** is a broadleaf contact herbicide. **Avoid contact with desirable vegetation.**

Use	Rate and Spray Volume	Use Restrictions and Comments
(See directions for use above for explanation of appropriate use sites)	2.75 fl oz/A in 20 to 40 gpa using ground or backpack or similar spray equipment	Make 1 to 2 applications per season to noncrop areas using ground equipment. Do not exceed two applications or 5.5 fl oz/A per season for noncrop weed control.
	0.5 to 1 fl oz/A in tank mixtures with glyphosate or other grass herbicide	

ROTATIONAL CROP RESTRICTIONS

Do not plant rotational crops other than cotton, potato, corn, soybeans, or wheat for 30 days following the last application of this product.

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal. Open dumping is prohibited.

Storage: Store in a cool place.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, pesticide spray 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 for guidance.

Container Disposal: **DO NOT** reuse empty container. Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

IMPORTANT: READ BEFORE USE

By using this product, user or buyer accepts the following conditions, warranty, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be accurate and should be followed carefully. However, because of extreme weather and soil conditions, use methods and other factors beyond the control of Nichino America, Inc. (NAI), it is impossible for NAI to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks are assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, WHICH EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of NAI is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. NAI disclaims any liability whatsoever for incidental or consequential damages, including, but not limited to, liability arising out of breach of contract, express or implied warranty (including warranties of merchantability and fitness for a particular purpose), tort, negligence, strict liability or otherwise.

LIMITATIONS OF LIABILITY: THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT THE ELECTION OF NICHINO AMERICA, THE REPLACEMENT OF PRODUCT.

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ET® is a trademark of Nichino America, Inc. Cottonquik® is a trademark of Entek Corporation. Cyclone®, Gramoxone®, and Starfire® are trademarks of Syngenta Crop Protection. DEF® 6, Dropp® 50WP, Finish®, Ginstar®, and Prep™ are trademarks of Bayer Crop Science. Roundup® is a trademark of Monsanto Company. Folex® 6EC is a trademark of Amvac.

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