71711-7 12-31-2008

1/23

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DEC 31 2008

Shannon Yanocha
Registration Specialist
Nichino America, Inc.
4550 New Linden Hill Rd., Ste 501
Wilmington, DE 19808

Subject: Notification(s) for Label Revisions under PRN 98-10 and PRN 2007-4
Label Revisions to the Warranty Statement

Dear Ms. Yanocha:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notices (PRN) 98-10 and 2007-4 dated November 14, 2008 for:

EPA Registration 71711-7 **ET Herbicide/Defoliant**

The Registration Division (RD) has conducted a review of the request(s) for applicability under PRN 98-10 and PRN 2007-4 and finds that the label changes requested fall within the scope of PRN-98-10 and PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

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

2/23

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060

Print Form

United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71711-7	Joanne Miller	☒ None ☐ Restricted
4. Company/Product (Name)	**PM#**	
ET Herbicide/Defoliant	23	

5. Name and Address of Applicant *(Include ZIP Code)*

Nichino America, Inc.
4550 New Linden Hill Rd., Suite 501
Wilmington, DE 19808

☐ *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar in composition and labeling to:

NOTIFICATION

EPA Reg. No. DEC 31 2008

Product Name

Section - II

☐ Amendment - Explain below.
☐ Resubmission in response to Agency letter dated
☒ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated
☐ "Me Too" Application.
☐ Other - Explain below.

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

Notification to revise the storage and disposal and warranty statements, to comply with EPA guidance.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☐ Label ☒ Container	1 gal; 1 qt	☒ On Label ☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product ☒ Lithograph / Paper glued / Stenciled ☐ Other

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Shannon Yanocha	Registration Specialist	302-636-9001

Certification

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
	Registration Specialist
4. Typed Name	**5. Date**
Shannon Yanocha	12/17/08

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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.

Nichino America, Inc.
Linden Park, Suite 501
4550 New Linden Hill Road
Wilmington, DE 19808
Tel: 302-636-9001 Fax: 302-636-9122

Sent via FEDEX

November 14, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 South Crystal Drive
Arlington, VA 22202-4501

Subject : NOTIFICATION : Nichino America ET Herbicide/Defoliant (EPA Reg. No. 71711-7) Label Revisions to the Warranty and Storage and Disposal Statements

The Nichino America product, ET Herbicide/Defoliant (EPA Reg. No. 71711-7) has been revised to update the warranty and storage and disposal statements. To support this notification action, enclosed please find :

- EPA Form 8570-1
- Revised final printed labeling, label code 110804 (3 copies)

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.

We appreciate your review of this submission. If you have any questions please contact me at (302) 636-9001 x227 or by email at syanocha@nichino.net.

Sincerely,

Shannon Yanocha
Registration Specialist

5/23

NOTIFICATION

DEC 31 2008

ET®

HERBICIDE/DEFOLIANT

Nichino America, Inc.

A Contact Herbicide for Broadleaf Weed Control, Defoliation, and Desiccation

(Not for Homeowner Use)

Active Ingredient:

Pyraflufen ethyl: ethyl 2-chloro-5-(4-chloro-5-difluoromethoxy-1-methyl-1*H*-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)
*contains petroleum distillates

EPA Reg. No. 71711-7
EPA Est. No. 37429-GA-1

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.)

FIRST AID

If swallowed: 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: Immediately hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five 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 a poison control center or doctor for treatment advice.

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 1-800-348-5832 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 distillates – vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

SEE ATTACHED BOOKLET FOR PRECAUTIONARY STATEMENTS AND COMPLETE DIRECTIONS FOR USE

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

Nichino America, Inc.
4550 New Linden Hill Rd., Suite 501
Wilmington, DE 19808
www.nichino.net

Net Contents: 1 quart

250522
110804

6/23

Nichino America, Inc.

NOTIFICATION
DEC 31 2008

ET®

HERBICIDE/DEFOLIANT

A Contact Herbicide for Broadleaf Weed Control, Defoliation, and Desiccation
(Not For Homeowner Use)

Active Ingredient:

Pyraflufen ethyl: ethyl 2-chloro-5-(4-chloro-5-difluoromethoxy-1-methyl-1*H*-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)
*contains petroleum distillates

EPA Reg. No. 71711-7 EPA Est. No. 37429-GA-1

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.)

250520
110804

FIRST AID

If swallowed	• 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	• Immediately hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five 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 a poison control center or doctor for treatment advice.
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.

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 distillates – vomiting may cause aspiration pneumonia. Probable mucosal damage may contraindicate the use of gastric lavage.

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)

Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category A on an EPA chemical-resistance category selection chart.

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.

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 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.

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).

9/23

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.

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 ¾ 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 downwind. 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 wind 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 and 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, nontarget crops) is minimal (e.g. when wind is blowing away from the sensitive areas).

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.

11/23

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 12 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
- Chemical resistant (such as nitrile or butyl) 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 non-agricultural uses, do not enter treated areas without protective clothing until sprays have dried.

GENERAL INFORMATION

ET® is designed for use as a contact herbicide for broadleaf weed control, defoliation, and desiccation.

ET is rainfast within one hour after application.

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 2 fl oz/acre to field corn, soybeans, or wheat, prior to planting, or emergence of crop only.
- Do not apply more than 5.5 fl oz/acre per growing season to root and tuber vegetables, leafy vegetables, cole crops, legumes, fruiting vegetables, cucurbits, and small grains.
- 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 up to 4 inches in height or less, or rosettes of 3 inches in diameter or less, by applications of **ET**. Tankmixes of **ET** with other herbicides may be needed for control of these weed species if larger than 4 inches tall or rosettes of greater than 3 inches in diameter.

Amaranth, Palmer
Bedstraw
Beggartick, hairy
Beggarweed, Florida
Bindweed, field
Buckwheat, wild
Canadian thistle
Canola
Carpetweed
Celery, wild
Chickweed
Cocklebur
Dandelion
Dock, curly
Eclipta
Eveningprimrose, cutleaf
Henbit
Knotweed, prostrate
Kochia
Ladysthumb
Lambsquarters, common
Lettuce, prickly
Mallow, common
Morningglory
Nettle, stinging
Nighshade, black
Pigweed, redroot
Pigweed, smooth
Pineapple-weed
Poinsettia, wild
Poison-ivy
Purlsane, common
Radish, wild
Ragweed, common
Ragweed, giant
Rocket, London
Russian thistle
Sesbania, hemp
Shepherd's-purse
Sicklepod
Smartweed, Pennsylvania
Smellmelon
Sowthistle, annual
Spurge, leafy
Sunflower, common
Toadflax, Dalmatian
Velvetleaf
Waterhemp, tall

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.

Use an approved agricultural buffering agent buffering to pH 7.5 or less if using **ET** in a water source of ≥ pH 7.5.

TANK MIXTURES

ET may be applied as a tankmix or in sequential application with other harvest aid, fungicide, insecticide or herbicide 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. Apply with grass herbicides if grassy weeds are present.

Tank mixtures of **ET** with 2,4-D or glyphosate will provide enhanced control of the following weed species:

Tank Mixtures with ET + 2,4-D		Tank Mixtures with ET + glyphosate	
Bindweed, field	Poison-ivy	Dandelion, common	Purslane, common
Buckwheat, wild	Russian thistle	Eveningprimrose, cutleaf	Radish, wild
Chickweed, common	Wild mustard	Geranium, Carolina	Rocket, London
Dandelion, common		Horsenettle (suppression)	Russian thistle
Kochia		Lambsquarters, common	Shepherd's-purse
Marestail		Morningglory	Sowthistle, annual
		Poison-ivy	Virginia-creeper

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Note: It is recommended that the compatibility of **ET** in any tankmix combination be tested before use. To determine the physical compatibility with other products, use a jar test, as described below:

Using a quart jar, add the proportionate amounts of the products to 1 qt. of water. Add wettable powders and water-dispersible granular products first, then liquid flowables, and emulsifiable concentrates last. After thoroughly mixing, let stand for at least 5 minutes. If the combination remains mixed or can be remixed readily, it is physically compatible. Once compatibility has been proven, use the same procedure for adding required ingredients to the spray tank.

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.

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.

APPLICATION AND DOSAGE

COTTON

Cotton Defoliation

Apply **ET** as part of a complete cotton defoliation program. When applied as a foliar spray to cotton, **ET** provides fast, effective defoliation of cotton plants. Adequate defoliation is generally achieved within 7 to 14 days depending on weather conditions. **ET** may be applied alone to cotton that is very physiologically mature; however, under less than optimal conditions, the most consistent defoliation, boll opening, and regrowth control is achieved with tankmixes of **ET** and other approved defoliation products. **ET** may be tank mixed or applied in sequence with other defoliant products such as Cottonquik®, Cyclone®, DEF® 6, Dropp® 50WP, Finish®, Folex® 6EC, Ginstar®, Gramoxone®, Prep™, or Roundup®.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Apply **ET** when sufficient mature bolls have developed to produce the desired yield (generally greater than 60%). Consult university recommendations for your region for testing of boll maturity. For best results, apply **ET** in a tankmix combination with other products to achieve the desired result. Apply using aerial or ground equipment at the rates specified in the dosage table (below) for your area when conditions are favorable for defoliation. 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. Thorough coverage is essential for consistent results.**

Crop	Rate and Spray Volume	Use Restrictions and Comments
Cotton	1.5 to 2.75 fl oz/A in 5 gallons water per acre by air or 20 to 30 gallons water per acre using ground equipment.	• Do not exceed two applications, or 5.5 fl oz/A for defoliation of cotton. • 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 nonbarked stem and may cause girdling of plants, crop damage, and/or loss of yield. **ET** may be tank mixed with other labeled herbicides for broad spectrum weed control.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Crop	Rate and Spray Volume	Use Restrictions and Comments
Cotton	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 2 fl oz/A in tank mixtures with other labeled herbicides	

Postemergence Layby

For best results, use **ET** herbicide in tank mixtures with other labeled herbicides for control of annual or perennial herbaceous broadleaf and grass weeds 4 inches or less in height, or rosettes less than 3" in diameter. Thorough, uniform spray coverage is essential for good control. Tank mixtures 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.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

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 other labeled herbicides	• Use the higher rate and spray volumes for control of larger weeds (4" tall). Control may be reduced with weeds larger than 4 inches tall. • 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.

FALLOW BEDS AND CROP STUBBLE (PREPLANT)

This product may be applied preplant to fallowland in preparation for planting or postharvest to crop stubble. Preplant applications may be made prior to planting during the fallow period for any crop listed on this label. For crops not listed on this label, applications must be made at least 30 days prior to planting.

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 other labeled herbicides for broad spectrum weed control.

Addition of a spray tank adjuvant such as, but not limited to, nonionic surfactants, methylated seed oils, or crop oil concentrates, at a concentration of 0.5% to 2.0%, is recommended for optimum control.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Preplant fallowbeds and crop stubble	Broadleaves and/or Grasses	0.5 to 2.0 fl oz/A plus other labeled herbicides in a minimum of 10 gallons water per acre*	• Use the higher rate and spray volumes for control of larger weeds (4" tall). Control may be reduced with weeds larger than 4 inches tall. • Do not make more than 3 applications or exceed 5.5 fl oz/A during the fallow period. • 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. • Do not allow livestock to graze in treated areas.

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

FIELD CORN, SOYBEANS, WHEAT, COTTON (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 to control broadleaf weeds or in tank mixtures with other labeled herbicides for broad spectrum weed control (see below).

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Cotton Field corn[1] Soybeans[1]	Broadleaves and/or Grasses	0.5 to 2.0 fl oz/A plus other labeled herbicides in a minimum of 5 gallons water per acre by air or 10 gallons water per acre by ground*	• Use the higher rate and spray volumes for control of larger weeds (4" tall). Control may be reduced with weeds larger than 4 inches tall. • Allow a minimum of 30 days between applications. • Treated areas may be replanted immediately with any crop listed on this label. • Do not plant any other rotational food crops for 30 days after the last application of **ET**. • Do not apply more than 2 fl oz/A for this use. • Do not allow livestock to graze in treated areas.
Wheat[1]	Broadleaves and/or Grasses	0.5 to 1.0 fl oz/A plus other labeled herbicides in a minimum of 5 gallons water per acre by air or 10 gallons water per acre by ground*	
[1]Addition of a spray tank adjuvant such as, but not limited to, nonionic surfactants, methylated seed oils, or crop oil concentrates, at a concentration of 0.5% to 2.0%, is recommended for optimum control.			

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

ROOT AND TUBER VEGETABLES, LEAFY VEGETABLES, COLE CROPS, LEGUMES, FRUITING VEGETABLES, CUCURBITS, AND SMALL GRAINS (LIMITED TO PRE-PLANT 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.

Addition of a crop oil concentrate (COC) or nonionic surfactant is recommended for optimum control. Use **nonionic surfactants** at a concentration of 0.25% and COC at a concentration of 1%. ET is a contact herbicide and thorough coverage of target weeds is essential for optimum performance.

If using ET in a water source of ≥ pH 7.5, use of an approved agricultural buffering agent is recommended.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Crop	Rate and Spray Volume	Use Restrictions and Comments
Root and tuber vegetables Leafy vegetables Cole crops Legumes Fruiting vegetables Cucurbits Small grains	0.5 to 2.0 fl oz/A plus other labeled herbicides in a minimum of 10 gallons water per acre by ground	• Use the higher rate and spray volumes for control of larger weeds (4" tall). Control may be reduced with weeds larger than 4 inches tall. • Do not make more than 3 applications or exceed 5.5 fluid ounces per acre per crop year. • Allow a minimum of 30 days between applications. • For crops listed on this label, do not apply within 2 days of planting. • Do not allow livestock to graze in treated areas.

NONCROP LAND AND UNCULTIVATED AGRICULTURAL AREAS CONSERVATION RESERVE PROGRAMS (CRP) AND FEDERAL SET ASIDE ACREAGE (nonfood producing)

ET herbicide may be used in tankmixes with other labeled herbicides for broad spectrum weed control in noncrop situations, including CRP and Federal Set Aside Acreage. 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.

Addition of a spray tank adjuvant such as, but not limited to, nonionic surfactants, methylated seed oils, or crop oil concentrates, at a concentration of 0.5% to 2.0%, is recommended for optimum control.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

Crop	Pest	Rate/Acre	Use Restrictions and Comments
Noncrop land and uncultivated agricultural areas CRP and Set-Aside Acreage[1]	Broadleaves and/or Grasses	0.5 to 2.0 fl oz/A plus other labeled herbicides in a minimum of 5 gallons water per acre by air or 10 gallons water per acre by ground.[2]	• Use the higher rate and spray volumes for control of larger weeds (4" tall). Control may be reduced with weeds larger than 4 inches tall. • 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. • Do not allow livestock to graze in treated areas.

[1] follow federal, state, and local rules for use on grass and hay
[2] use higher rates for hard to control weeds such as Canadian thistle, field bindweed, and kochia

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. **ET** may be tank mixed or applied in sequence with other desiccant products such as diquat for improved desiccation.

Read and follow all label directions for each tankmix product. Always use in accordance with the most restrictive of label precautions and limitations.

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.

STORAGE AND DISPOSAL

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

Pesticide 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: Nonrefillable container. DO NOT reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then, offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by State or 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 must 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. To the extent consistent with applicable law, all such risks are assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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. To the extent consistent with applicable law, 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: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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.

ET® is a trademark of Nichino America, Inc. Cottonquik® is a trademark of E. I. du Pont de Nemours and Company. Cyclone®, and Gramoxone®, 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 Monstanto Company. Folex® 6EC is a trademark of Amvac.

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

Nichino America, Inc.

4550 New Linden Hill Rd., Suite 501
Wilmington, DE 19808

www.nichino.net

250520
110804