71711-25 4-11-2007

1/21

NOTIFICATION

APR 11 2007

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

SUBJECT: Application for Pesticide Notification – Edited Directions for Use/Add Tables
ET® 2% SC Herbicide/Defoliant
EPA Reg. No. 71711-25
Application Dated March 12, 2007

Dear Ms. Maks:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the product above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

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

Nichino America, Inc. www.nichino.net

Delivered by Hand

March 12, 2007

NOTIFICATION

APR 11 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504-C)
Registration Division-H7505C
U.S. Environmental Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Submission of Submission of Edited "Directions for Use" Per Notification and PR Notice 98-10
Nichino America, Inc.
ET® 2% SC Herbicide/Defoliant
(EPA Reg No. 71711-25)

To Whom It May Concern:

Nichino America, Inc. requests the Agency's review of the edited "Directions for Use" for the subject product, per PR Notice 98-10 Section II. M. 2. Addition of tables which present the same use directions already approved by the EPA. We are submitting this revised label to the EPA as a notification, at the suggestion of Mr. Jim Stone, Team 25.

Attached are the following:

- EPA application form, 8570-1
- "Certification Statement"
- Two (2) copies of ET 2 % SC Herbicide labeling, identified as 031307
- One (1) copy of labeling, with change highlighted

If you have any questions, you are welcome to call me at (302) 636-9001 or email at mmaks@nichino.net. Thank you.

Sincerely,

Marie A. Maks

Marie A. Maks
Senior Manager, Regulatory Affairs
Nichino America, Inc.

4550 New Linden Hill Road • Suite 501 • Wilmington, Delaware 19808
Tel: (302) 636-9001 • Fax (302) 636-9122

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Marie Maks

From: Stone.James@epamail.epa.gov
Sent: Monday, March 12, 2007 1:11 PM
To: Marie Maks
Cc: Miller.Joanne@epamail.epa.gov
Subject: Re: Guidance re: Error on Label (ET 2 SC Herbicide EPA Reg No. 71711-25)

NOTIFICATION

APR 11 2007

ET2SCChange0307.doc.pdf (919 K...

Marie,

Since this is an editorial correction, you can submit a notification and start marketing with the corrected label immediately.
If you need a stamped accepted label for the states, you can submit this as an administrative amendment and we will review and stamp accepted the label. Please call if any questions.
Jim Stone
703-305-7391

Marie Maks <mmaks@nichino.net>
03/12/2007 11:52 AM

To: James Stone/DC/USEPA/US@EPA
cc:
Subject: Guidance re: Error on Label (ET 2 SC Herbicide EPA Reg No. 71711-25)

Hi, Jim.

Our distributor has informed us that on page 14 of the master label (approved by the EPA on Aug, 2006) the directions should read fluid oz product/tank, not product/gallon. See attachment. Without this correction to the backpack recommendation, a grower could put 5x what is recommended. I checked and this same recommendation appeared on the first label that was signed off by the EPA in 2005. This backpack recommendation is for the non-crop use pattern.

I need to submit the change to the EPA. Could I have your thoughts about the following considerations for submission:

1- editorial with change to label and final printed label sent to the EPA
2- notification
3- administrative with approval by EPA product manager required

I assumed # 3, but wanted to confirm this with you, before I submitted it to the EPA.

4/21

Thank you.

Marie A. Maks
Senior Manager, Regulatory Affairs
Nichino America, Inc.
4550 New Linden Hill Road Suite 501
Wilmington, DE 19808
Phone: (302) 636-9001 Ext. 3
Fax: (302) 636-9122
Cell: (302) 598-3429
(See attached file: ET2SCChange0307.doc.pdf)

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NOTIFICATION

APR 11 2007

Certification Statement

NOTIFICATION OF EDITED "DIRECTIONS FOR USE" FOR TYPOGRAPHICAL ERROR

PER PR NOTICE 98-10

Nichino America, Inc. ET 2% SC Herbicide/Defoliant
(EPA Reg. No. 71711-25)

"This notification is consistent with the provisions of PR Notice 98-10 Directions for Use" (Section M.) edited change 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 the 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."

Marie A. Maks

Marie A. Maks

Senior Mgr, Reg Affairs

Title

March 12, 2007

Date

Nichino America, Inc.

Form Approved. OMB No. 2070-0060. Approval expires 05-31-98

United States
Environmental Protection Agency
Washington, DC 20460

		OPP Identifier Number
	Registration	6/12
	Amendment	
X	Other	

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71711-25	Joanne Miller	
4. Company/Product (Name)	PM#	X None Restricted
ET2% SC Herbicide/Defoliant	23	

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

Nichino America Inc.
4550 New Linden Hill Road
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 or identical in composition and labeling to:
EPA Reg. No.
Product Name

NOTIFICATION
APR 11 2007

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: NON-PRIA ACTION: Notification
To submit revised section 3 federal label as notification with correction to use directions in chart.
Attachment: two copies of label, identified as 031307; ""Certification Statement"; letter M.A. Maks to Notif., dated March 12, 2007

Section - III

1. Material This Product Will Be Packaged In:

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

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

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

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)
Marie A. Maks	Manager, Regulatory Affairs	(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
Marie A. Maks	Manager, Regulatory Affairs
4. Typed Name	5. Date
Marie A. Maks	March 12, 2007

NICHINO AMERICA, INC.

ET® 2%SC Herbicide/Defoliant

NOTIFICATION

APR 11 2007

A Nonselective Contact Herbicide for Broadleaf Weed Control

(NOT FOR HOMEOWNER USE)

Alternate Brand Name: **EDICT® 2%SC IVM Herbicide**
EDICT® 2SC IVM Herbicide
For Noncrop Weed Control and Industrial Vegetation Management

Venue™ Herbicide
A Nonselective Contact Herbicide for Tree, Nut, and Vine Crops

Octane™ 2%SC Herbicide
Octane™ Herbicide
For Use in Nurseries and Ornamental Plantings; Sodfarms; Christmas Trees; and Established Ornamental Turf
(Intended for sale to and use by commercial applicators and professional land scapers only. Not for sale or use by homeowners.)

Active Ingredient:

Pyraflufen ethyl: ethyl 2-chloro-5-(4-chloro-5-difluoromethoxy-1-methyl-1*H*-pyrazol-3-yl)-4-fluorophenoxyacetate	**2.0%**
Other Ingredients:	**98.0%**
Total:	**100.0%**

Contains 0.177 lb. pyraflufen ethyl per gallon (20 grams per liter)

EPA Reg. No. 71711-25

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
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.
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.	

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

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wear long-sleeved shirt and long pants, socks, shoes, and chemical resistant gloves (Selection Category A).

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:
- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves

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 product 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.

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)

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.

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 gloves
- Shoes plus socks

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® 2%SC is designed for use as a nonselective herbicide for broadleaf weed control.

Do not apply if rainfall is expected within one hour.

Only certified applicators are permitted to apply **ET 2%SC** for turf and ornamental sites.

USE RESTRICTIONS

- Do not apply more than 2.4 fl oz/acre to field corn, cotton, soybeans, or wheat, prior to planting, or emergence of crop only.
- **Do not apply this product through any type of irrigation system.**

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.

WEEDS CONTROLLED

The following broadleaf weed species can be controlled by applications of **ET 2%SC** in the manner described below at 3 to 6 inches tall. Tankmixes of **ET 2%SC** with other herbicides may be needed for control of larger weeds:

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

MIXING DIRECTIONS

Add ½ to ¾ of the required amount of water to the spray tank. Start agitation. Add the required amount of **ET 2%SC** 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 2%SC** in a water source of ≥ pH 7.5.

TANK MIXTURES

ET 2%SC may be applied as a tankmix or in sequential application with other herbicide, 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 application. Apply with grass herbicides if grassy weeds are present.

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

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

Note: It is recommended that the compatibility of **ET 2%SC** 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.

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

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 2%SC 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 2%SC 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

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

For best results, use **ET 2%SC** 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 2%SC** herbicide may be applied preplant burndown to control broadleaf weeds or in tank mixtures 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
Field corn Cotton Soybeans Wheat	Broadleaves and/or Grasses	0.7 to 2.4 fl oz/A plus other labeled herbicides in a minimum of 5 gpa 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 ap plications. • 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 2%SC**. • Do not allow livestock to graze in treated areas. • Do not apply more than 2.4 fl oz/A for this use.

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

Deciduous Fruit And Nut Trees And Vines (excluding citrus)
(Dormant And Prebloom Applications - pome fruit, stone fruit, grapes, and tree nuts)

ET 2%SC may be applied as a preplant burndown treatment for control of emerged winter annual and summer annual broadleaf weeds and burndown or suppression of certain perennial broadleaf weeds during the dormant period prior to bloom. **ET 2%SC** should be tank mixed with one or more labeled herbicides for broad spectrum weed control. **ET 2%SC** should be applied to emerged weeds less than 4" in height or rosettes less than 3" in diameter. Thorough coverage of target weeds is essential for optimum performance.

If using **ET 2%SC** in a water source of ≥ pH 7.5, use an approved agricultural buffering agent buffering to pH 7.5 or less.

Addition of a crop oil concentrate (COC) or nonionic surfactant is recommended for optimum control. Follow manufacturer's recommended use rates.

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
Grapes Pome Fruit Stone Fruit Tree Nuts	Winter annual weeds and/or grassy weeds	0.7 to 4.0 fl oz/A plus other labeled herbicides in a minimum of 10 gallons water per acre in a broadcast or band directed application	▪ 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 6.8 fl oz/A during the growing season. ▪ Do not apply by air. ▪ Allow a minimum of 30 days between applications. ▪ Do not allow spray to contact green bark of trunk area on young great vines and fruit or nut trees.

Nonbearing Deciduous Fruit And Nut Trees And Vines (Excluding Citrus)

For best results, apply **ET 2%SC** 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 adequate control.

Addition of a crop oil concentrate (COC) or nonionic surfactant is recommended for optimum control. Follow manufacturer's recommended use rates.

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
Nonbearing tree fruit, nut, and vine crops	Control of annual grasses and/or broad-leaf weeds	0.7 to 4.0 fl oz/A plus 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 make more than 3 applications or exceed 6.8 fl oz/A during the growing season. • Do not apply by air. • Allow a minimum of 30 days between applications. • Do not harvest edible crops for 12 months following application. • Addition of labeled residual herbicides to extend weed control is permissible. • Do not allow livestock to graze in treated areas.

Noncrop land and uncultivated agricultural areas (nonfood producing)

ET 2%SC herbicide may be used in tankmixes with other labeled herbicides for broad spectrum weed control in noncrop situations. For best results, use **ET 2%SC** 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. Follow manufacturer's recommended use rates.

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 lands and uncultivated agricultural areas	Broadleaves and/or Grasses	0.7 to 4.0 fl oz/A plus other labeled herbicides in a minimum of 5 gpa 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. ▪ Do not make more than 3 applications or exceed 6.8 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.

* 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; sodfarms; 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 2%SC** at rates specified in the dosage table below for control of broadleaf weeds. **ET 2%SC** may be tank mixed with other labeled herbicides for broad spectrum weed control. **ET 2%SC** is a broadleaf contact herbicide. **Avoid contact with desirable vegetation.**

Addition of a crop oil concentrate (COC) or nonionic surfactant is recommended for optimum control. Follow manufacturer's recommended use rates.

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

Use	Rate/Acre	Use Restrictions and Comments
(See directions for use above for explanation of appropriate use sites)	0.7 to 4 fl oz/A plus other labeled herbicides in a minimum of 5 gpa by air or 10 gallons water per acre by ground*	▪ Do not make more than 3 applications or exceed 13.6 fl oz/A per year using ground equipment. ▪ Allow a minimum of 30 days between applications.

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

Nurseries And Ornamental Plantings; Sodfarms; Christmas Trees; Established Ornamental Turf (Intended for sale to and use by commercial applicators and professional landscapers only. Not for sale or use by homeowners.)

Turfgrass Tolerance
Established turfgrasses tolerant to application of **ET 2%SC** at labeled rates are listed below. For turfgrass species not listed on this label, the user should apply **ET 2%SC** to a small test area to assure tolerance. A slight transitory yellowing or discoloration may occur on some sensitive turfgrass species under stress 3 to 5 days following application of **ET 2%SC** at labeled rates. Recovery is typically 4 to 7 days from application.

Cool Season Turfgrasses (creeping bentgrass, Kentucky bluegrass, Rough bluegrass, tall fescue, perennial ryegrass). Cool season grasses, both newly seeded and established, are generally tolerant to application of **ET 2%SC** at labeled rates. To evaluate tolerance of certain species, apply to a small test area before treating large areas to assure tolerance. Be aware and observe all label restrictions regarding turfgrass tolerance when **ET 2%SC** is tank mixed with another product.

Warm Season Turfgrasses (common and hybrid bermudagrass, centipedegrass, St. Augustinegrass, zoysiagrass). Warm season turfgrasses listed above are generally tolerant to applications of **ET 2%SC** at labeled rates. Centipedegrass may exibit a slight yellow 3 to 7 days after application, however complete recovery is expected. To evaluate tolerance of certain species, apply to a small test area before treating large areas to assure tolerance. Be aware and observe all label restrictions regarding turfgrass tolerance when **ET 2%SC** is tank mixed with another product.

Newly Seeded, Sodded, or Sprigged Turfgrass
ET 2%SC may be applied to newly seeded, sodded, or sprigged turfgrass that is established and not subject to impending stress due to moisture, temperature, or other cultural practices. Areas treated with **ET 2%SC** may be seeded or overseeded one day following application.

Dormant Turfgrass
Applications of **ET 2%SC** to dormant warm season turfgrasses are permitted. Avoid applications when warm season turfgrasses are transitioning into or out of dormancy.

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 2%SC** at rates specified in the dosage table below for control of broadleaf weeds. **ET 2%SC** is a broadleaf contact herbicide. **ET 2%SC** may be tank mixed with other registered grass herbicides for control of grassy weeds. **Avoid contact with desirable vegetation.**

Use	Rate/Acre	Use Restrictions and Comments
Nursery and ornamental plantings Sodfarms Christmas trees Established Ornamental turf	Apply **ET 2%SC** at rates of 1.0 to 4.0 fluid ounces per acre in 20 to 40 GPA for control of seedling, non-mature winter and summer annual weeds and/or for temporary burndown of weeds listed in Table 1. Tank mixes including other broadleaf herbicides with **ET 2%SC** may be needed for control of larger winter and summer annual weeds. Apply **ET 2%SC** at rates of 0.7 to 1.5 fluid ounces per acre in tank mix combinations with herbicides registered for use such as amines, esters, and salts of 2,4-D, chloroprop, dicamba, mecoprop, MCPA, triclopyr, fluroxypyr, and various combination of these products for control of annual weeds and perennial weeds listed in Table 1. Residual, long-term control of the target weeds is as defined by the labeling of the companion product. For tank mixing with herbicides follow the tank mix directions.	▪ Do not make more than 3 applications or exceed 13.6 fl oz/A per year using ground equipment. ▪ Allow a minimum of 30 days between applications. ▪ Do not apply by air. ▪ Do not apply when environmental conditions favor spray drift or poor spray coverage. ▪ Avoid spray drift onto nontarget susceptible plants such as vegetables, flowers, ornamental, trees, shrubs, and other desirable plants. ▪ Do not apply to lawns or turf where clovers and carpetgrass are desirable. ▪ Not for use on golf course greens or tees.

Backpack Sprayer Dosage Chart

For use in backpack sprayers having tank capacity of 3 to 5 gallons, accurate calibration and measurement of the appropriate amount of product may be difficult due to the very small amounts of product required. For backpack application, it is recommended that a **stock solution containing 3 fluid oz of ET 2%SC per U.S. gallon** be prepared in a clean container and used following the dosage table below. Do not prepare more gallons of stock solution than can be sprayed in one day. Storage and use of the previous day's stock solution may result in reduced activity. Do not mix other herbicides in the stock solution.

Backpack tank capacity (gallons)	Spray volume (gallons/A)	fluid oz product per tank for 1.5 fl oz/A	fluid oz stock solution per tank
3	20	0.23	10.0
	30	0.15	6.5
	40	0.11	4.5
4	20	0.30	13
	30	0.20	8.5
	40	0.15	6.5
5	20	0.38	16
	30	0.25	10.5
	40	0.19	8

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.

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