



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 28, 2021

Michael Kellogg  
Agent for Alligare, LLC  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. Ct. NW  
Gig Harbor, WA 98332

Subject: Notification per PRN 98-10 – Add optional marketing graphics  
Product Name: Picloram + 2,4-D RTU  
EPA Registration Number: 81927-74  
Application Date: April 29, 2021  
Decision Number: 576483

Dear Mr. Kellogg:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Derek Corbin at 703-347-8903 or by email at [Corbin.Derek@epa.gov](mailto:Corbin.Derek@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

[Note to reviewer: [Text] in brackets denotes optional text **or graphics**.  
 [Note to reviewer: {Text} in braces denotes where in the final label text will appear].

**[{BOOKLET FRONT PANEL LANGUAGE}]**

**NOTIFICATION**

81927-74

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/28/2021

**PICLORAM + 2,4-D RTU**  
**[Alternate Brand Name: Alligare Triumph® RTU Herbicide]**

For use in controlling unwanted trees via cut surface treatments in forests and non-cropland areas (fencerows, roadsides, and rights-of-way and similar sites).

**[Not for Sale, Sale Into, Distribution and/or Use in Nassau and Suffolk Counties of New York State.]**

**ACTIVE INGREDIENTS:**

Picloram: 4-amino-3,5,6-trichloropicolinic acid, triisopropanolamine salt ..... 5.4%  
 2,4-Dichlorophenoxyacetic acid, triisopropanolamine salt\* ..... 20.9%

**OTHER INGREDIENTS:** ..... 73.7%

**TOTAL:** ..... 100.0%

Picloram + 2,4-D RTU contains the following acid equivalents: picloram: 4-amino-3,5,6-trichloropicolinic acid – 3.0% (0.27 lb./gal.); 2,4-dichlorophenoxyacetic acid – 11.2% (1.00 lbs./gal.).

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

<b>FIRST AID</b>	
<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not give any liquid to the person.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything to an unconscious person.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Contains ethylene glycol.	

[See] [inside] [label] [booklet] [for] [First Aid][,] [additional] [Precautionary Statements][,] [and] [Directions for Use] [including Storage and Disposal] [instructions][.]

EPA Reg. No. 81927-74

EPA Est. No.

NET CONTENTS: Gals. (     Liters)

**MANUFACTURED FOR:**

Alligare, LLC  
 1565 5<sup>th</sup> Avenue  
 Opelika, AL 36801

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE,  
 CALL CHEMTREC (800) 424-9300

# {LANGUAGE INSIDE BOOKLET}

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Prolonged or frequent repeated skin contact may cause allergic reactions in some individuals.

#### PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves Category C, such as barrier laminate  $\geq 14$  mils, butyl rubber  $\geq 14$  mils, nitrile rubber  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, polyvinyl chloride (PVC)  $\geq 14$  mils, or viton  $\geq 14$  mils
- Shoes plus socks
- Protective eyewear
- For containers over 1 gallon, but less than 5 gallons: Mixers and loaders who do not use a mechanical system (such as probe and pump or spigot) to transfer the contents of this container must also wear coveralls or a chemical-resistant apron.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, clothing or PPE must not be reused until it has been cleaned.

#### ENGINEERING CONTROL STATEMENTS

For containers of 5 gallons or more: Do not open pour from this container. A mechanical system (such as probe and pump or spigot) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], 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/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This pesticide is toxic to some plants at very low concentrations. Non-target plants may be adversely affected if pesticide is allowed to drift from areas of application.

This pesticide may be toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to inter tidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate.

2,4-D has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

Picloram is known to leach through soil into groundwater under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

This chemical can contaminate surface water through spray drift. Under some conditions, picloram may also have a high potential for runoff into surface water (primarily via dissolution in runoff water), for several months post-application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas over-laying extremely shallow groundwater, areas with in-field canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetative filter strips, and areas over-laying tile drainage systems that drain to surface water.

## PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

## 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.

Use undiluted only as indicated below.

### 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 48 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 Category C, such as barrier laminate  $\geq$  14 mils, butyl rubber  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, polyvinyl chloride (PVC)  $\geq$ 14 mils, or viton  $\geq$  14 mils
- Shoes plus socks
- Protective eyewear

### **NON-AGRICULTURAL 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, nurseries, or greenhouses.

Do not enter or allow others to enter the treated area until sprays have dried.

### **PRODUCT INFORMATION**

Picloram + 2,4-D RTU is a ready-to-use product that is effective in cut surface applications for killing unwanted trees and preventing undesirable sprouting of cut trees in forest and other non-crop areas (fencerows, roadsides, rights-of-way and similar sites).

### **PRECAUTIONS AND RESTRICTIONS**

**[Not for Sale, Sale Into, Distribution and/or Use in Nassau and Suffolk Counties of New York State.]**

Use this product only as specified on this label.

Maximum Use Rates:

NON-CROP USE: On rights-of-way and other non-crop areas do not apply more than 4 gallons of Picloram+2,4D RTU per acre per year. Do not make more than one application per year.

FORESTRY USE: Do not apply more than 4 gallons Picloram+2,4D RTU per acre per two years. Do not make more than one application every two years.

Picloram + 2,4-D RTU is highly active, is water-soluble, can move with surface runoff water, and can remain phytotoxic for a year or more if it gets into the soil.

Do not contaminate cropland, water, or irrigation ditches.

Do not contaminate water intended for irrigation or domestic purposes. To avoid injury to crops or other desirable plants, do not treat or allow spray drift or run-off to fall onto banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation or domestic purposes. Do not apply to snow or frozen ground.

Do not apply on residential or commercial lawns or near ornamental trees and shrubs. Untreated trees can occasionally be affected by root uptake of herbicide through movement into the topsoil or by excretion of the product from the roots of nearby treated trees. Do not apply Picloram + 2,4-D RTU within the root zone of desirable trees unless such injury can be tolerated.

Do not permit any spray or spray drift to contact non-target plants. Use only gravity flow or very low spray pressure.

Small amounts of this product can cause injury to plants. Do not apply on or in the vicinity of sensitive crops or desirable broadleaf plants.

Do not rotate food or feed crops on treated land if they are not registered for use with picloram until an adequately sensitive bioassay or chemical test shows that no detectable picloram is present in the soil.

Do not remove product from original container except to apply as indicated under the Directions For Use.

Do not apply through any type of irrigation system.

Mixing and Loading: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

#### WOODY PLANTS CONTROLLED BY PICLORAM + 2,4-D RTU

ailanthus	birch	dogwood	green ash	hickory	oaks	serviceberry
alder	cedar	elm	gum	hornbeam	pecan	sourwood
aspen	cherry	firs	hawthorn	maples	persimmon	sweetbay

#### APPLICATION METHODS

##### Tree Injection Treatment

Apply 1 milliliter of undiluted Picloram + 2,4-D RTU solution through the bark completely around the tree trunk at 2 to 3 inch intervals between edges of the injector wounds. When using the tree injector, make injections near ground level. When using a Hypohatchet Injector or similar device, make injections 2 to 4 feet above the ground. Treatments can be made in any season. Do not treat maples during the spring sap flow. For some difficult to control species such as dogwood, hickory, sugar maple, bigleaf maple, tanoak, and some firs, make applications to a continuous cut rather than to spaced cuts.

Note: No Worker Protection Standard worker entry restrictions or worker notification requirements apply when this product is directly injected into agricultural plants.

##### Frill or Girdle Treatment

As close to the ground as feasible, make a single hack girdle or "frill" of overlapping ax cuts through the bark completely around the tree. Paint or spray the injured surface with undiluted Picloram + 2,4-D RTU, using enough product to wet treated areas.

##### Stump Treatment

Using undiluted Picloram + 2,4-D RTU, paint or spray cut surfaces of freshly cut stumps and stubs. Thoroughly wet the cambium area next to the bark.

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Keep container tightly closed when not in use. Do not use or store near heat or open flame.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of

by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Non-refillable container: Do not reuse or refill this container. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.

Non-refillable container less than or equal to 5 gallons: 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 ¼ 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.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

(non refillable > 5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use for disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Cleaning the container before final disposal is the responsibility of the person disposing of the container.

## **CONDITIONS OF SALE AND WARRANTY**

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions must be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALLIGARE, LLC, its Supplemental Distributors, or the Seller. All such risks shall be assumed by the Buyer.

ALLIGARE, LLC, its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. To the extent consistent with applicable law, NEITHER ALLIGARE, LLC NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF ALLIGARE, LLC, ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO

REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL ALLIGARE, LLC, ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALLIGARE, LLC, its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALLIGARE, LLC

No employee or agent of ALLIGARE, LLC, its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

Triumph is a registered trademark of Alligare, LLC

[EPA [2020062320210429](#)]

**[OPTIONAL MARKETING LANGUAGE/GRAPHIC]**

**[The item below represents a graphic depicting the corresponding area of use. The graphic may or may not appear on the final printed label. The graphic will only represent an individual object or outsides of buildings as described below. No people, animal, or food will be depicted in graphics.]**

[Image of tree stumps]

