



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 27, 2022

Lenora J. Jones
Registration Specialist
Washington State Department of Agriculture
P.O. Box 42560
Olympia, Washington 98504-4260

Subject: FIFRA 24(c) Registration – SLN Amendment Acknowledgment Letter
SLN Registration Number: WA160006
EPA Decision Number: 581594
SLN Expiration Date: December 31, 2026
Parent EPA Reg. No.: 62719-702
Product Name: Cleantraxx™

Dear Ms. Jones:

This letter acknowledges receipt of an amendment for the above-listed Special Local Need (SLN) registration pursuant to Section 24(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. The original SLN registration permits use of Cleantraxx™ (oxyfluorfen and penoxsulam) in conifers (such as Douglas fir) and tree plantations to control false dandelion, woodland groundsel and ceanothus seedlings. You indicated that site preparation prior to planting is a critical window of opportunity for weed control in managed conifer and tree plantings and the sensitivity of conifer species to many of the soil-residual herbicides registered for use in site preparation limits the usefulness of some products. This amendment will extend the expiration date to 12/31/2026.

The Agency has completed a review of the amendment of this use and acknowledges the State's SLN registration, as amended. Please inform the registrant that we have placed a copy of the amended SLN label in our files. If you have any questions, please contact Ruthanne Loudon by phone at (202) 566-1849 or via email at louden.ruthanne@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Ruthanne Loudon".

Ruthanne Loudon, Acting Senior Regulatory Specialist
Emergency Response Team
Minor Use and Emergency Response Branch
Registration Division
Office of Pesticide Programs

cc: *Chad Schulze, EPA Region 10 Coordinator*
Derrick Terada, EPA Region 10 Tribal Coordinator

FIFRA Section 24(c) Special Local Need (SLN) Label

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

Cleantraxx™

EPA Reg. No. 62719-702

24(c) Special Local Need Registration EPA SLN No. WA-160006

(For Distribution and Use Only within the State of Washington)

This label for Cleantraxx expires and must not be distributed or used in accordance with this SLN registration after December 31, 2026

For Control of False Dandelion, Woodland Groundsel and Ceanothus Seedlings in Conifer (such as Douglas fir) and Tree Plantations

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

This labeling must be in the possession of the user at the time of application.

Read the label affixed to the container of Cleantraxx™ before applying. Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the EPA registered label.

Use of Cleantraxx according to this Special Local Need labeling is subject to all use precautions and limitations imposed by the label affixed to the container of Cleantraxx.

Directions for Use

Use Restrictions

- Do not apply more than 4.5 pints of Cleantraxx per acre per year.
- Do not graze or harvest plants from areas treated with Cleantraxx for feed or forage for domestic livestock.
- For use under this SLN label do not apply this product through any type of irrigation system.
- Do not apply when weather conditions favor drift to non-target areas.
- Spray Drift buffer restrictions:
 - A 25 foot vegetative buffer strip must be maintained between all areas treated with this product and lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fishponds.
- For aerial applications:
 - Do not apply when inversion conditions exist or when wind velocity exceeds 10 mph.
 - For upwind and side borders, maintain a minimum buffer zone of 150 feet from any non-targeted vegetable fallow bed, crop, or desirable vegetation.

Conifer and Tree Plantations

Cleantraxx™ herbicide may be applied to conifer and tree plantations as aerial or ground broadcast applications, spot or directed spray applications for pre-emergent and early post-emergent control of herbaceous broadleaf weeds (such as false dandelion and woodland groundsel), and grasses and pre-emergent control of germinating seeds of Ceanothus species (such as snowbrush ceanothus). Applications can be made for site preparation or for release as broadcast over-the-top of trees. Tank-mix combinations with labeled rates of other herbicides can be made provided: (1) the tank mix product is labeled for the timing and method of application for the use site to be treated and (2) mixing is not prohibited by the label of the registered tank mixed products. Use as directed in the Directions of Use section of all herbicides in the mix.

Application Directions

For best control from broadcast and spot or directed spray applications of Cleantraxx, recommended spray volumes are 10 to 25 gallons per acre by air or 10 to 50 gallons per acre by ground. For ground applications lower spray volumes (5 gallons per acre) may be used, however, lower spray volumes may reduce weed control or conifer tolerance, so users should gain local experience to see if results are acceptable. The addition of an adjuvant such as 1 quart per 100 gallons of crop oil concentrate, methylated seed oil or 0.25% v/v (1 quart per 100 gallons of spray) of an 80% active nonionic surfactant is required for effective post-emergence control of susceptible emerged weeds. Adjuvants containing organosilicone are not recommended. For applications over-the-top of conifers, use only adjuvants/surfactants for which the desired conifers are known to be tolerant.

Post-emergent applications made when weeds are less than 4 inches in height are most effective.

Repeat treatments may be made, but the total amount of Cleantraxx applied must not exceed 4.5 pints per broadcast acre per year. To prevent misapplication, spot treatments and directed spray treatments should be applied using calibrated application methods. To prevent misapplication, spot or directed treatments should be applied with a boom, boomless spray systems, hand-held or backpack sprayers.

For broad spectrum applications use Cleantraxx tank mixed with an appropriate herbicide such as Opensight, Accord XRT II, Rodeo, Garlon 4 Ultra, Garlon XRT, Transline, Vastlan or other herbicides registered for use on these sites and for these application methods. When tank mixing, read and carefully follow all applicable use directions, precautions and limitations on the respective product labels.

Spot Applications

For spot application, apply sprays uniformly to soil or over the top of conifers (if applied as a release treatment) for preemergent weed control. For ground applications use 10 to 50 gallons per acre. Lower spray volumes (5 gallons per acre) may be used, however, lower spray volumes may reduce weed control or conifer tolerance, so users should gain local experience to see if results are acceptable. The addition of an adjuvant such as 1 quart per 100 gallons of crop oil concentrate, methylated seed oil or 0.25% v/v (1 quart per 100 gallons of spray) of an 80% active nonionic surfactant is required for effective post-emergence control of susceptible emerged weeds. Adjuvants containing organosilicone are not recommended. For applications over-the-top of conifers, use only adjuvants/surfactants for which the desired conifers are known to be tolerant.

Site Preparation

Use Cleantraxx at 3 to 4.5 pints per acre in site preparation applications prior to planting to control herbaceous weeds and sensitive woody brush seedlings. Tank mixes with other herbicides labeled for use in forestry, conifer and tree plantations can be made to broaden the spectrum of control of various weedy plants. Conifers may be planted into areas treated with Cleantraxx but disturbance of the treated soil can break the herbicide barrier and decrease weed control. Also, planters should avoid placing treated soil into the rooting zone of the tree seedlings. When tank mixtures of herbicides are used, labels for all products in the mixture must be followed and the longest specified waiting period before planting observed.

Woody Plant Seedling Control

Apply Cleantraxx at 3 to 4.5 pints per acre for pre-emergent control of Ceanothus brush seedlings, such as snowbrush ceanothus. Apply prior to germination of seedlings either in the spring or fall. Fall applications should be made prior to the ground freezing for the winter.

Release Applications

Cleantraxx at 3 to 4.5 pints per acre may be applied broadcast by aerial or ground applications or as a spot or directed spray application over-the-top of conifers such as Douglas-fir, Ponderosa pine, incense cedar, white fir, and grand fir for pre-emergent and early post-emergence control of weeds. In general, applications made before bud break or after terminals harden off have the least potential for injury to crop trees. Applications made during active growth stages may injure desirable trees. Users should determine through field trials whether applications of Cleantraxx give acceptable tree tolerance under local conditions for tree species not listed above.

WSDA Aquatic Advisory: This pesticide is toxic to aquatic invertebrates and wildlife. Cleantraxx should not be used under this SLN label where impact on threatened or endangered species is likely. You may refer to the WSDA Endangered Species Program web site at <https://agr.wa.gov/departments/land-and-water/natural-resources/endangered-species-program> or contact the Washington Department of Fish & Wildlife, National Marine Fisheries Service (NOAA Fisheries) or US Fish & Wildlife Service for information regarding aquatic species listed as threatened or endangered. Consult the federal label for additional restrictions and precautions to protect aquatic organisms. This product is classified as having high potential for reaching surface water via runoff for several months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of penoxsulam and oxyfluorfen from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

WSDA Container Disposal Guidance: Pesticide containers must be properly cleaned prior to disposal. The best time to clean empty pesticide containers is during mixing and loading, because residue can be difficult to remove after it dries. Triple rinse (or pressure rinse) the pesticide container, empty all pesticide rinse water into the spray tank, and apply to a labeled crop or site. Recycling cleaned containers is the best method of container disposal. Information regarding the recycling of empty and cleaned plastic pesticide containers in Washington is available on the WSDA Waste Pesticide Program web site at <https://agr.wa.gov/wastepesticide>. Cleaned containers may also be disposed of in a sanitary landfill, if permitted by the county. Burning is not a legal method of container disposal in Washington.

Conditions and Risks of Use for Special Local Need

USE OF CLEANTRAXX HERBICIDE (THE "PRODUCT") ON CONIFER (SUCH AS DOUGLAS FIR) AND TREE PLANTATIONS (THE "CROP") FOR THIS SPECIAL LOCAL NEED MAY RESULT IN CROP INJURY, CROP YIELD REDUCTION AND/OR CROP LOSS AS FURTHER DISCUSSED BELOW. READ AND UNDERSTAND THESE CONDITIONS AND RISKS OF USE FOR SPECIAL LOCAL NEED BEFORE USING THE PRODUCT ON THE CROP.

This Product is available for use in the manner described in this Special Local Need (SLN) label on the basis that, in the sole opinion of the user, the benefits and utility derived from the use of the Product on the Crop outweigh the potential risk of Crop injury, Crop yield reduction or Crop loss. The decision to use this Product in the manner described in this SLN Labeling must be made by each individual user on the basis of anticipated benefits versus (i) the potential risk of Crop injury, Crop yield reduction and Crop loss, (ii) the severity of the target pest infestation, (iii) the cost and availability of alternative pest controls and (iv) any other relevant factors.

By purchasing the Product for use, or using the Product, in the manner described in this SLN Labeling, you acknowledge and accept that to the extent permitted by law:

- (1) you assume all risk of Crop injury, Crop yield reduction and Crop loss;
- (2) Dow AgroSciences does not make, and does not authorize any agent or representative to make, any representations or recommendations regarding the use of this Product on the Crop other than the statements on this SLN labeling;
- (3) Dow AgroSciences does not make, and does not authorize any agent or representative to make, any warranties, express or implied, with respect to the use of the Product on the Crop and disclaim all warranties, expressed or implied, including any implied warranty of merchantability;
- (4) Dow AgroSciences disclaims all liability for any damages, losses, expenses, claims or causes of actions arising out of or relating to Crop injury, Crop yield reduction and/or Crop loss;
- (5) these Conditions and Risks of Use for Special Local Need supersede any contrary representations or recommendations by Dow AgroSciences, or its respective agents or representatives, and any provisions in or on any Product literature or labeling including any provisions on the label affixed to the Product container.

If these Conditions and Risks of Use for Special Local Need are not acceptable, the unopened Product may be returned to the seller for a refund or used for a different labeled use in accordance with the label affixed to the Product container.

These Conditions and Risks of Use for Special Local Need are required by Dow AgroSciences and not specified by the US EPA or the State of Washington.

Registrant:

**Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268**

®™ Trademarks of Dow AgroSciences, DuPont or Pioneer and their affiliated companies or respective owners

R419-006

Accepted: __/__/__

Replaces: R419-002