

ADVISORY: ENLIST™ HERBICIDES U.S.D.O.T. COMPLIANT TRANSPORT LABELING

Proper Hazmat Labeling of Repacked Containers

Issued January 2020

Guidance provided

This guidance document contains portions of and excerpts from the U.S.D.O.T [Hazardous Material Regulations](#) (HMR) on the Transport of Hazardous Materials. It is intended to assist and provide you with a general understanding marking, labeling and shipping paper requirements. As mentioned, this presentation may not be all exclusive of HMR. Please be aware, it is the **shipper's responsibility** to properly classify, package, mark, label, placard, and prepare hazardous materials for transportation (see 49 CFR [173.22](#)). The information shared should not be viewed as legal advice, and you may consider obtaining your own independent evaluation.

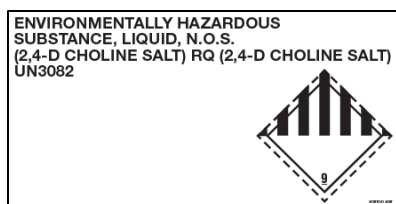
Hazardous Material Classification and Transportation Labeling

As provided in section fourteen of the Safety Data Sheet, Enlist One® and Enlist Duo® herbicides are classified for U.S. domestic transportation as **UN3082, Environmentally Hazardous, Materials Liquid, n.o.s. (2,4-D Choline Salt), 9, PG III, RQ (2,4-D Choline Salt)**.

This transport classification is assigned because **2,4-D Choline Salt is listed in 49 CFR part 172.101, Appendix A as a hazardous substance with a reportable quantity of 100 pounds**. Therefore, when 2,4-D Choline Salt is in a quantity, in one package/container, which equals or exceeds the reportable quantity (e.g., 100 pounds), the package/container or intermediate bulk container (i.e. tote or mini-bulk) must be labeled and handled in accordance with the HMR.

Retailers or distributors who repack bulk Enlist One or Enlist Duo herbicide are responsible for properly labeling and preparing those containers for transport.





<i>Product</i>	<i>Regulated for transport</i>
Enlist One herbicide 5.55 lbs. per gallon 2,4-D choline salt	Containers holding volume greater than or equal to 18 gallons [†]
Enlist Duo herbicide 2.38 lbs. per gallon 2,4-D choline salt	Containers holding volume greater than or equal to 42 gallons [†]




Hazmat transport labels for 2,4-D choline salt are provided by Corteva Agriscience via the [Power To Promote](#) website in *Corteva Items section > Bulk & mini-bulk components* section. Contact your Corteva Crop Protection Territory Manager for assistance obtaining product labels, hazmat transport labels and bills of lading (shipping papers) with the Enlist product description pre-filled.

[†]Trademarks of Dow AgroSciences, DuPont or Pioneer, and their affiliated companies or their respective owners. Enlist Duo and Enlist One herbicides are not registered for sale or use in all states or counties. Contact your state pesticide regulatory agency to determine if a product is registered for sale or use in your area. Enlist Duo and Enlist One are the only 2,4-D products authorized for use with Enlist crops. Consult Enlist herbicide labels for weed species controlled. Always read and follow label directions.

Container Examples

1-gal 2.5-gal or 5-gal Pails	20-gal drum	55-gal drum	250-gal tote
			
Not regulated for either product, no hazmat label or shipping papers required	Regulated only for Enlist One, hazmat label and shipping papers required	Regulated for both Enlist One and Enlist Duo, hazmat label and shipping papers required	*Regulated for both Enlist One and Enlist Duo, hazmat label and shipping papers required

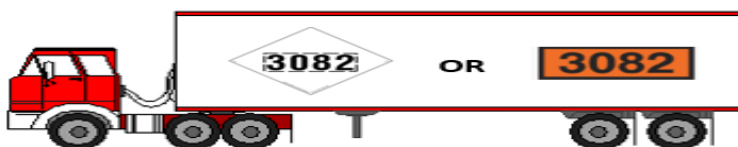
 Red rectangles indicate placement of hazmat transport labels.

* Note: 49cfr, part 172.514(c)(4) allows an IBC to be labeled as illustrated above. The shipper may also affix a placard with the corresponding UN/ID number (3082), or on an orange panel or white square-on-point configuration on two opposite sides.

Transport Vehicle UN/ID Number Example

For class 9 (UN3082), a Class 9 placard is not required to be displayed on a transport vehicle or freight container for domestic transportation within the United States. However, there are two situations where the UN/ID number (e.g.,3082) must be affixed on each side and each end of the transport vehicle or freight container with a white square-on-point configuration or an orange panel.

1. When a bulk packaging (IBC/Tote) with a capacity greater than 119 gallons for a liquid is contained in or on a transport vehicle or freight container and the UN number 3082 displayed on the IBC/Tote is not visible.
2. When transport vehicle contains only one single hazardous material (Enlist One and/or Duo) with an aggregate gross weight of 8,820 pounds; the hazardous material is loaded at one facility; and the transport vehicle contains no other hazardous materials.



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Additional information

To see general requirements related to shipping papers, reference 49 CFR [177.817](#) and specific requirements for completing the shipping paper in 49 CFR [172.202](#). Shipping papers must be retained for 3 years.

When retailers sell repacked Enlist herbicides in containers that require hazmat transport labels, they must offer shipping papers to the buyer with the UN/ID number, proper shipping name, class, packing group, RQ, quantity and type of container used.

Loading, unloading, and securement requirements are found in 49 CFR [177.834](#). Hazardous materials must be secured.

Helpful information on complying with transportation requirements and exemptions for farmers can be found at PesticideStewardship.org.

Consult U.S.D.O.T. regulations for further information.

[†]100 lbs maximum unregulated volume of a 2,4-D salt / (55.7% 2,4-D choline in 1 gal Enlist One X 9.956 lb/gal at 68°F bulk density of Enlist One)

^{*}100 lbs maximum unregulated volume of a 2,4-D salt / (24.4% 2,4-D choline in 1 gal Enlist Duo X 9.772 lb/gal at 68°F bulk density of Enlist Duo)