

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5 AUG 1993

Karen S. Shearer
Rhone-Poulenc AG Company
P.O. Box 12014
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

Dear Ms. Shearer:

Subject: Revised Label - Clarify Use Directions for Rice
Rhomene MCPA Amine Herbicide
EPA Registration No. 264-47
Your Submission Dated February 6, 1993

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) Due to new EPA policy, part of the Environmental Hazards section has been changed. To comply, change the sentence "Do not apply directly to water except as specified on this label" to read "For terrestrial uses, do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark."
- 2) Add the appropriate Net Contents statement.
- 3) For the purpose of clarity, change the upper recommended amount for Rice from "2/1/2" to "2 1/2" pints per acre.

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above changes, before releasing the product for shipment.

CONCURRENCES							
SYMBOL	117505C						
SURNAME	D. KENNY						
DATE	9/4/93						

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RHOMENE[®] MCPA AMINE Herbicide

CONTROLS WEEDS IN FLAX, RICE, PEAS AND SMALL GRAINS

ACTIVE INGREDIENT

2-methyl-4-chlorophenoxyacetic acid, dimethylamine salt*52.1%

INERT INGREDIENTS:47.9%

*2-Methyl-4-chlorophenoxyacetic acid equivalent 42.6% or 4 pounds per gallon.

EPA Reg. No. 264-47AA

EPA Est. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido traducida ampliamente.

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577
For PRODUCT USE Information Call 1-800-334-9745

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: If patient is conscious and alert, give 2 to 3 glasses of water to drink. Do not induce vomiting. Get medical attention.

ON SKIN: Wash skin with plenty of soap and water, if available, while removing contaminated clothing and shoes. Wash clothing separately before reuse.

IF IN EYES: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention, preferably an ophthalmologist.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Administer oxygen if necessary. Get medical attention.

NOTE TO PHYSICIAN

No specific antidote is available. All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.

This product is irritating to mucous membranes. If large amounts (greater than 1 ml/kg body weight) of the product have been ingested, the stomach should be evacuated by gastric intubation with the aid of a cuffed endotracheal tube to prevent exposure of the esophagus. After removal of stomach contents, wash stomach by instilling 30 to 50 g. of activated charcoal in 3 to 4 ounces of water through the stomach tube and again remove stomach contents. Avoid oily laxatives.

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Irritative. Causes irreversible eye damage. Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Mixers/loaders and applicators are required to use face shields or goggles. Avoid breathing vapors or spray mist. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

Drift or run-off may adversely affect non-target plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters.

Avoid spray drift to susceptible plants such as cotton, beans, tomatoes, and ornamentals. Coarse sprays are less likely to drift. Do not apply when weather conditions favor drift from treated areas. Avoid use of small diameter spray nozzles. At high air or ground surface temperatures, vapors from this product may injure susceptible plants.

MIXING AND LOADING: Most cases of groundwater contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of ground water supplies. Use of closed systems for mixing and 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 ground water contamination.

CLEANING OF EQUIPMENT: Do not use the same spray equipment for other purposes unless thoroughly cleaned. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

with COMMENTS
in EPA Letter Dated:

5 AUG 1993

BEST AVAILABLE COPY

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 264-47AA

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DIRECTIONS FOR USE

It is a violation of Federal law to use this label in a manner inconsistent with its labeling.
Read entire label before using this product.

GENERAL WORKER PROTECTION STATEMENT

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area treated must be vacated by unprotected persons. Do not enter treated areas without protective clothing until sprays have dried.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in treated area or in an area about to be treated with this product. Advise workers to stay out of fields during application and until sprays have dried. Regular long-sleeved work clothing should be worn when working in treated fields. See PRECAUTIONARY STATEMENTS, STATEMENT OF PRACTICAL TREATMENT and NOTE TO PHYSICIAN for information on accidental exposures. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: appropriate signal word (DANGER), area treated with RHOMENE® MCPA Amine Herbicide, date of application, appropriate protective clothing, and reentry interval (i.e., until sprays have dried).

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food or feed by storage or disposal. Store in original container in a dry secured storage area. Keep container tightly closed when not in use.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law and may contaminate ground water. 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

Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities by burning. If burned, stay out of smoke.

GENERAL CAUTIONS AND RESTRICTIONS

Do not apply RHOMENE® MCPA Amine Herbicide through any type of irrigation system.

Do not use in or near a greenhouse.

COMPATIBILITY

If RHOMENE® MCPA Amine Herbicide is to be tank mixed with other pesticides, compatibility should be tested prior to mixing. To test for compatibility, use a small container and mix a small amount (0.5 to 1 quart) of spray, combining all ingredients in the same ratio as the anticipated use. If any indications of physical incompatibility develop, do not use this mixture for spraying. Indications of incompatibility usually will appear within 5 to 15 minutes after mixing. Read and follow all directions and precautions on this label and on labels of any product(s) for which a tank mixture is being considered.

GENERAL INFORMATION

RHOMENE® Herbicide is effective on a large number of broadleaf weeds and is useful for controlling these weeds in certain crops. Several crops, such as flax, rice, oats and small grains underseeded to legumes, are more tolerant of MCPA than they are of 2,4-D. RHOMENE® MCPA Herbicide is the amine form of MCPA that is easily dissolved in water, even in the hard waters found in some areas. Mix thoroughly while diluting this material and mix again if allowed to stand long before spraying.

To convert locally recommended application rates into amount of RHOMENE® MCPA Amine Herbicide, use the following table.

MCPA acid	1 1/2 lbs.	1 1/4 lbs.	1 lb.	3/4 lb.	1/2 lb.	3/8 lb.	1/4 lb.
RHOMENE® Herbicide	3 pts.	2 1/2 pts.	2 pts.	1 1/2 pts.	1 pt.	3/4 pt.	1/2 pt.

INJURY TO CROPS MAY OCCUR FROM THIS PESTICIDE. IF YOU ARE NOT PREPARED TO ACCEPT SOME DEGREE OF CROP INJURY, DO NOT USE THIS PRODUCT.

Crop varieties vary in response to MCPA, and some may be easily injured. Apply RHOMENE® MCPA Amine Herbicide only to varieties known to be tolerant to MCPA. If you are uncertain concerning tolerant varieties or local use situations that may affect crop tolerance to MCPA, contact your seed company or state Agricultural Extension Service for advice.

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GENERAL WEED LIST

WEEDS CONTROLLED BY PROPERLY APPLIED TREATMENTS OF RHOMENE® HERBICIDE INCLUDE THE FOLLOWING:

- | | |
|--------------------------------------|--------------------------------|
| <i>Amaranthus</i> species (pigweeds) | pepperweeds (except perennial) |
| common burdock | plantains |
| common cocklebur | purslanes |
| common lambequarters | ragweed (common and giant) |
| dandelion | shepherdspurse |
| field pennycress | thistle (bull and Russian) |
| mustard (except blue mustard) | yellow rocket |

RECOMMENDATIONS FOR APPLYING RHOMENE® MCPA AMINE HERBICIDE

CEREAL GRAINS

CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
WHEAT, BARLEY, OATS and RYE (not underseeded with legumes) Annual weeds Annual and Biennial Weeds Perennial broadleaf weeds	0.5 pint 1 to 2 pints* 1.5 to 2 pints*	Apply after grain is in the 4-leaf stage, but not forming joints in the stem. Do not spray in the boot to dough stage. Apply after grain is fully tillered (usually about 4 to 8 inches high), but not forming joints in the stem. Do not apply in the boot to dough stage.
Emergency control in wheat Perennial broadleaf weeds	3 pints	Apply when weeds are approaching bud stage, but do not spray grain in the boot to dough stage. The 3 pints (1.5 lb. acid equivalent) per acre application can produce injury to wheat. Balance the severity of your weed problem against the possibility of crop damage. Where perennial weeds are scattered, spot treatment is suggested to minimize the effect of crop injury.
WHEAT, BARLEY, OATS and RYE (underseeded with legumes) Alfalfa, alsike, red and ladino clovers, trefoil	0.5 pint	Treat after grain is tillered and in the 4-leaf stage and when legumes are 2 to 3 inches tall. Small grains should form a protective canopy over the legume seedlings. Do not use more than 6 gallons of water per acre; higher volumes may result in injury to legumes. Do not apply to grain underseeded with vetch or sweet clover. Do not spray when grain is in the boot to dough stage.

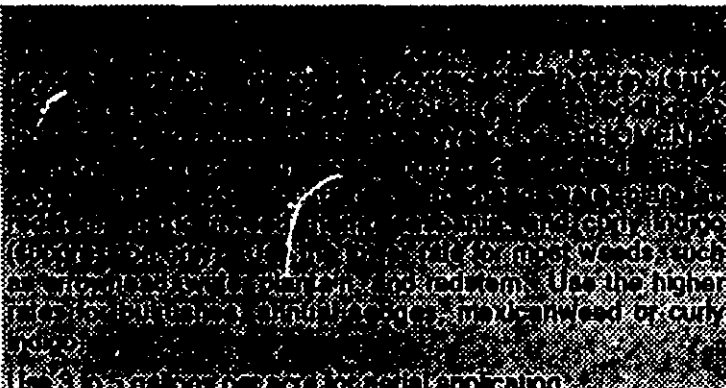
*Use the lower rate if small annual and biennial weeds are the major problem. Use the higher rate if perennial weeds or annual and biennial weeds are present which are in the hard-to-kill categories as determined by local experience. The higher rates increase the risk of grain injury and should be used only where the weed control problem justifies the risk of grain damage.

RESTRICTIONS AND LIMITATIONS FOR USE ON CEREAL GRAINS

A minimum of 10 gallons of water per acre for ground application and 2 gallons of water per acre for aerial application is recommended, unless specific site directions listed above indicate otherwise.

Do not allow livestock to forage or graze treated areas within 7 days of slaughter.

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CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
FLAX	1/3 to 1/2 pint	Apply when flax is 2 to 8 inches tall. Do not spray once flax has reached the bud stage. Use at least 8 to 10 gallons of water per acre for ground application and at least 3 to 5 gallons of water per acre for aerial application.
RICE	1 1/2 to 2 1/2 pints	 <p>Use the higher rate for control of annual species, such as Canada thistle or curly top. Use 3 to 5 gallons per acre for aerial application.</p>
RICE (California Only)	1 to 1 1/2 pints	Treat when rice is in the 3 to 4-leaf stage and has well established root systems, usually 18 to 24 days after planting. Applications made during hot weather or at the higher rate may cause temporary stunting of the rice. For best results, weeds should be exposed at time of application. If retreatment is necessary, usually 35 to 65 days after planting, the total amount per acre of RHOMENE® Herbicide applied should not exceed 2 1/2 pints in one season. Use 8 to 10 gallons per acre for aerial application.
PEAS	1/2 to 3/4 pint	Treat when peas are 4 to 6 inches tall. Do not spray while peas are in blossom. Peas may show slight injury, but they usually recover a few days after treatment. Use the higher rate before buds form on Canada thistle to prevent from going to seed. Do not spray peas that are stressed from lack of moisture or when temperatures are over 90° F. Apply in 15 to 30 gallons of water per acre for ground application and 5 gallons of water per acre for aerial application.

RESTRICTIONS AND LIMITATIONS FOR USE ON FLAX AND RICE

- Do not allow livestock animals to forage or graze treated areas within 7 days of slaughter.
- Do not grow crayfish or catfish in treated rice fields.

RESTRICTIONS AND LIMITATIONS FOR USE ON PEAS

- Do not allow livestock to forage or graze treated pea fields.
- Do not feed treated vines to livestock.
- Do not treat bean type peas (i.e., crowder, blackeye, etc.).

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GRASSES GROWN FOR SEED PRODUCTION

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WEEDS IN CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
Annual broadleaf weeds	1 to 2 pints	Apply to established stands in the spring before the seed head comes into the boot stage. Do not spray in boot stage of growth. In seedling grasses apply in the spring after the grass has tillered or has at least 5 leaves but before the boot stage. Use only the low rate on seedling grasses. DO NOT USE IN CALIFORNIA.
Biennial and Perennial broadleaf weeds	2 to 3 pints	

RESTRICTIONS AND LIMITATIONS FOR USE ON GRASSES FOR SEED PRODUCTION

Do not graze dairy animals or cut forage for hay within 21 days of application.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants that this product conforms to the chemical description on the label; that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such directions; and that the directions, warnings and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of residues on food crops and upon reports of field experience. Tests have not been made on all soils or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

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, WARNINGS OR CAUTIONS.

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NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

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