

APR 21 1994

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 Text
 RHOMENE MCPA Amine Herbicide
 EPA Registration No. 264-47
 Your Submission Dated December 17, 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 provision:

Add the appropriate Net Contents statement.

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

Sincerely yours,

Joanne I. Miller
 Product Manager (23)
 Fungicide-Herbicide Branch
 Registration Division (7505C)

Enclosure

CONCURRENCES

SYMBOL	7505C						
SURNAME	D. KENNY						
DATE	4/21/94						

RHOMENE[®] MCPA AMINE Herbicide

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 21 1992

CONTROLS WEEDS IN FLAX, RICE, PEAS AND SMALL GRAINS

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended for the pesticide registered under EPA Reg. No. 264-477

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail)

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.

IF 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

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Avoid breathing vapors or spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear: coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure and protective eye wear. When mixing, loading or repairing and cleaning equipment used with this product, persons must also wear 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, 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 (personal protective equipment) 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.

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ENVIRONMENTAL HAZARDS

Drift or run-off may adversely affect non-target plants. 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. 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.

DIRECTIONS FOR USE

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

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 specified 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 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 over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure and protective eye wear.

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. Avoid freezing. If stored below 20°F (-6.6°C), rewarm container and agitate.

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.

RETURNABLE -- REFILLABLE CONTAINERS

After use, return the container to the point of purchase or designated locations. This container must only be refilled with RHOMENE® MCPA Amine Herbicide. DO NOT REUSE THE CONTAINER FOR ANY OTHER PURPOSE. Prior to refilling, inspect thoroughly for damage such as cracks, punctures, abrasions and damaged or worn out threads on closure devices. Do not refill or transport damaged or leaking containers. Check for leaks after refilling and before transportation. For information on the disposal of unused, unwanted product, contact Rhône-Poulenc at 1-800-334-9745. For information on cleanup of spills, contact Rhône-Poulenc at 1-800-334-7577. If the container is not being refilled, return it to the point of purchase.

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 the labels of any product(s) for which a tank mixture is being considered.

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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.

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 lambsquarters	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.

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	Treat 7 to 10 weeks after planting when rice is fully tillered and 6 to 8 inches above water. Do not spray rice when the flag leaf is visible and could be contacted with spray (early boot stage), or loss of rice yield could result. In addition to those weeds found on the General Weed List, RHOMENE® will provide control of the following broadleaf weeds in rice crops: annual sedges, bulrushes, arrowhead, water plantain, redstem, mexicanweed, hemp sesbania, and curly indigo (suppression only). Use the lower rate for most weeds, such as arrowhead, water plantain, and redstem. Use the higher rates for bulrushes, annual sedges, mexicanweed or curly indigo. Use 3 to 5 gallons per acre for aerial application.
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

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.
Biennial and Perennial broadleaf weeds	2 to 3 pints	DO NOT USE IN CALIFORNIA.

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 direction 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 varieties 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.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY 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. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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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Rhône-Poulenc Ag Company
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709

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