

PM 23

264-492

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2/23/99

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FEB 23 1999

Ms. Lizbeth R. Simila  
Rhône-Poulenc Ag Company  
P.O. Box 12014, T.W. Alexander Dr.  
Research Triangle Park, NC 27709

Dear Ms. Simila:

SUBJECT: Label Amendment Changing Signal Word and Precautionary Statements  
Technical 2,4-D Acid  
EPA Reg. No.: 264-492  
Your Submission Dated February 8, 1999

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

1. Revise the oral statement of practical treatment to read as follows:  
  
"IF SWALLOWED: Call a physician or Poison control Center. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol."
2. Revise the dermal statement of practical treatment to read as follows:  
  
"IF ON SKIN: Wash with plenty of soap and water. Get medical attention."
3. Add an inhalation statement of practical treatment as follows:  
  
"IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention."
4. Add the following statement to the Note to Physician:  
  
"Probable mucosal damage may contraindicate the use of gastric lavage."

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CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Feb 23, 1999							

- 5. Insert the following statement into the paragraph under Hazard to Humans and Domestic Animals: "Wear protective eyewear (face shield or goggles)."
- 6. Revise the effluent discharge statement under Environmental Hazards in accordance with PR Notice 93-10:

"Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA."

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling incorporating these changes before you release the product for shipment.

Sincerely yours,



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

Enclosure

# Technical 2,4-D Acid

FEB 23 1999  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
264-492

For Use in the Manufacture of Herbicides

ACTIVE INGREDIENT: 2,4-Dichlorophenoxyacetic acid\* ..... 99.3%  
INERT INGREDIENTS: ..... 0.7%

\*Isomer specific by AOAC Method No. 6D01-5 (12th ed)

EPA Reg. No. 264-492

EPA Est. No.

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER**

## STATEMENT OF PRACTICAL TREATMENT

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

**IF SWALLOWED:** If patient is conscious and alert, give 2-3 glasses of water or milk to drink. If available, give one tablespoon of Syrup of Ipecac to induce vomiting. Alternatively, induce vomiting by touching back of throat with finger. Get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person.

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

### 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.

## PRECAUTIONARY STATEMENTS

### DANGER

#### HAZARD TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Harmful if swallowed, absorbed through the skin or inhaled. Do not get in eyes, on skin or on clothing. Do not inhale dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

#### ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## 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.

For use only by manufacturers in the formulation of herbicides. Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Only for formulation into a herbicide for (1) the following uses:

#### AGRICULTURAL CROPS

Wheat, barley, oats, rye, corn, sorghum, soybeans, rice, sugarcane, stone fruit, nut orchards.

#### TERRESTRIAL NON-CROP

Grasses, rangeland, pastures, conservation reserve program, fencerows, drainage ditchbanks, golf courses, cemeteries, parks, turf, fallowland, crop stubble, highway rights-of-way, railroads, sod farms, and similar non-crop areas.

#### AQUATICS

Water hyacinth, water milfoil and other aquatic weeds.

#### FORESTRY

Forestry site preparation, pine release.

(2) Uses for Which USEPA has Accepted the Required Data and/or Citations of Data that the Formulator has Submitted in Support of Registration and (3) Uses for Experimental Purposes that are in Compliance with USEPA Requirements.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994, must contain the

revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below.

**GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING**

- 1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."
- 2. Containers of 5 gallons or more in capacity must also bear the following statement: "A mechanical system (probe and pump) 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."

**SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING**

**1. FOR AGRICULTURAL USES**

- a. **Clothing Requirement Statements:** "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection(face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.
- b. **Personal Hygiene Statements:** "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."
- c. The maximum application rate to pasture and rangeland is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per acre per application per site.
- d. The maximum application rate to forestry site preparation is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application per site.
- e. A reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

**2. FOR INDUSTRIAL/AQUATIC USES**

- a. **Clothing Requirement Statements:** "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection(face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.
- b. **Personal Hygiene Statements:** "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

**3. FOR RESIDENTIAL AND TURF USES**

- a. **Clothing Requirement Statements:** 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."; 2) For Amine Liquid Products carrying "CAUTION" signal word : "When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves."; 3) For Amine Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."; 4) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves."; 5) For Acid, Sodium Salt and Ester liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."
- b. **Personal Hygiene Statements:** 1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."; 2) For All Liquid Products: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water." Remove saturated clothing as soon as possible and shower.
- c. The maximum application rate to turf is the lower of 1) existing application rate on currently registered label or 2) 2 pounds 2,4-D acid equivalent per application per site. The maximum number of broadcast applications per treatment site is 2 per year.
- d. The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

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## STORAGE AND DISPOSAL

### STORAGE

Do not contaminate water, food or feed by storage or disposal. Store in a dry place.

### PESTICIDE DISPOSAL

Pesticide wastes are toxic. 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

Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

## DISCLAIMER AND INDEMNITY FOR FORMULATORS' USES

THE MANUFACTURER EXPRESSLY DISCLAIMS ALL LIABILITY FOR CLAIMS AND ACTIONS (WHETHER BASED ON CONTRACT, TORT, STRICT LIABILITY OR BREACH OF WARRANTY) ARISING OUT OF, RESULTING FROM OR CONNECTED WITH A FORMULATION CONTAINING THIS PRODUCT WHEN USED FOR ANY PURPOSE OTHER THAN THOSE USES SET FORTH IN (1) ABOVE. THE MANUFACTURER HAS NOT DEVELOPED SCIENTIFIC DATA TO SUPPORT, NOR HAS IT EXPLICITLY OR IMPLICITLY APPROVED, ANY USES OTHER THAN THOSE IN (1) ABOVE.

ANY FORMULATOR OR BUYER WHO USES THIS PRODUCT IN FORMULATIONS FOR ANY USE OTHER THAN THOSE STATED IN (1) ABOVE ASSUMES ALL LIABILITY FOR CLAIMS AND ACTIONS ARISING OUT OF, CONNECTED WITH OR RESULTING FROM SUCH USE AND AGREES BY SO USING THIS PRODUCT TO INDEMNIFY AND HOLD HARMLESS THE MANUFACTURER FROM SUCH CLAIMS AND ACTIONS.

THIS DISCLAIMER AND INDEMNITY IS IN ADDITION TO, NOT IN LIEU OF, THE BELOW DISCLAIMER AND LIMITATIONS.

## 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 item (1) of the Directions for Use when it is used in accordance with such Directions; and that the statements under item (1) of the Directions, the warnings and other statements on this label, other than the suggested uses under items (2) and (3) of the Directions, 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. Seller's guarantee shall be limited to the terms set out on the label and subject thereto, the buyer assumes the risk to persons or property arising from the use or handling of this product on that condition.

**NET CONTENTS: 500 lbs.**

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TECHNICAL 2,4-D ACID (PENDING) Submitted 2/8/99.