



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 17 1994

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RHONE-POULENC AG COMPANY
P. O. Box 12014
Research Triangle Park, NC 27709

OFFICE OF
PREVENTION, PESTICIDES AND
PROFITABLE PRACTICES

SUBJECT: Label Amendment Submission of 07/30/93 in Response to PR Notice 93-7
EPA Reg. No. 264-522
WEEDAR IVM 44 BROADLEAF HERBICIDE


Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE PRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1) of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stamped-accepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.

Sincerely,


James Tompkins, Deputy Chief
Registration Support Branch
Registration Division (7505W)



Recycled/Recyclable
Printed with Soy/Canola ink on paper that
contains at least 50% recycled fiber

WEEDAR[®] Brand IVM 44 Broadleaf Herbicide

2,4-D Amine Weed Killer for Non-Crop Use

ACTIVE INGREDIENT:

2,4-Dichlorophenoxyacetic acid, dimethylamine salt* 46.8%

INERT INGREDIENTS: 53.2%

*2,4-Dichlorophenoxyacetic acid equivalent 38.9% by weight or 3.8 pounds per gallon

*Isomer specific by AOAC method No. 6.D01-5

E.P.A. Reg. No. 264-522

E.P.A. Est. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

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 ON SKIN: Wash skin with plenty of soap and water. Remove contaminated clothing. Get medical attention.

IF SWALLOWED: If patient is conscious and alert, give 2 to 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. Do not make an unconscious person vomit. Get medical attention.

IF IN EYES: Flush with water for at least 15 minutes. Get medical attention, **PREFERABLY AN OPHTHAMOLOGIST.**

IF INHALED: Move to an uncontaminated area. Get medical attention.

NOTE TO PHYSICIAN

This product contains a phenoxy herbicidal chemical. There is no specific antidote. 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

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed or absorbed through the skin. Causes irreversible eye damage. Avoid breathing vapors or spray mist. Do not get in eyes, on skin, or on clothing. 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 enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required. When applying from a tractor with an enclosed cab or airplane with enclosed cockpit, it is recommended that gloves worn during handling the concentrate be removed prior to entering an enclosed cab or cockpit.

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.

NOTE: (1) For containers over 1 gallon, but less than 5 gallons, persons engaged in pouring of this product must also wear coveralls or chemical-resistant apron. (2) For containers of 5 gallons or more, a mechanical transfer system (probe and pump) must be used for transferring the contents of the container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and non-target plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters. Do not apply when weather conditions favor drift from treated areas. Do not use the same spray equipment for other purposes unless thoroughly cleaned.

Do not contaminate water used for irrigation or domestic purposes (except as specifically recommended on this label) especially in areas where grapes, cotton, tomatoes or other susceptible plants are grown.

Do not treat irrigation ditches in areas where water will be used to overhead (sprinkler) irrigate susceptible crops especially grapes, tomatoes, tobacco, and cotton.

MIXING AND LOADING: Most cases of ground water contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of ground water supplies. Use of closed systems for mixing or transferring this pesticide will reduce the

ACCEPTED
with COMMENTS
FEB 17 1974
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
264-522

probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent ground water contamination.

Do not apply WEEDAR® IVM 44 Broadleaf Herbicide directly to, or permit to drift onto cotton, okra, grapes tomatoes, fruit trees, vegetables, flowers or other desirable crop or ornamental plants which are susceptible to 2,4-D herbicide. Do not apply near susceptible plants since very small quantities of the 2,4-D will cause severe injury during the growing or dormant periods. Crops contacted by WEEDAR® IVM 44 Broadleaf Herbicide sprays or spray drift may be killed or suffer significant stand loss with extensive quality and yield reduction.

Do not apply when a temperature air inversion exists. Such a condition is characterized by little or no air movement and an increase in air temperature with an increase in height. In humid regions, a fog or mist may form. An inversion may be detected by producing a smoke column and checking for a layering effect. If questions exist pertaining to the existence of an inversion, consult with local weather services before making an application.

Use coarse sprays to minimize drift. Do not apply with hollow cone-type insecticide or other nozzles that produce fine spray droplets. Drift from aerial or ground application may be reduced by: (1) applying as near to the target as possible in order to obtain coverage; (2) by increasing the volume of spray mix per acre; (3) by decreasing the pounds of pressure at the nozzle tips; and (4) by using nozzles which produce a coarse spray pattern; (5) by not applying when wind is blowing toward susceptible crops or valuable plants.

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 label.

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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL CAUTIONS AND RESTRICTIONS

Do not apply WEEDAR® IVM 44 Broadleaf Herbicide through any type of irrigation system.

Do not use in or near a greenhouse.

MIXING INSTRUCTIONS

Mix WEEDAR® IVM 44 Broadleaf Herbicide only with water, unless otherwise directed on this label. Add about one-half the water to the mixing tank, then add WEEDAR® IVM 44 with agitation and finally the rest of water with continuing agitation.

NOTE: Adding oil, wetting agent, or other surfactants to the spray may increase effectiveness on weeds.

COMPATIBILITY

If WEEDAR® IVM 44 Broadleaf Herbicide is to be tank mixed with fertilizers or 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 qt) 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 products for which a tank mixture is being considered.

APPLICATION PROCEDURES

Apply by air or ground equipment in sufficient gallonage to obtain adequate coverage, except as otherwise directed on this label.

Use 2 or more gallons of water per acre for aerial application and 10 or more gallons of water per acre for ground application.

GENERAL INFORMATION

Be sure that use of this product conforms to all applicable laws, rules and regulations. Certain states have restrictions pertaining to application distances from susceptible crops. The applicator should become familiar with these laws, rules or regulations and follow them exactly.

GENERAL WEED LIST

Annual and Biennial Weeds

*beggarticks
 bullthistle
 coffeeweed
 common cocklebur
 common burdock
 common evening primrose
 common lambsquarters
 hairy galinsoga
 jimsonweed
 *knotweed

*mallow (venice or little)
 marshelder
 morningglory (common, ivy, wooly)
 *musk thistle(***)
 mustards (except blue mustard)
 pepper weeds (except perennial)
 **pigweeds (Amaranthus spp.)
 prickly lettuce
 ragweed (common or giant)
 rough fleabane

*Russian thistle
 Salsify (western or common)
 *smartweeds (annual species)
 sowthistles (annual or spiny)
 sunflower
 *vervains
 vetches
 wild carrot
 wild lettuce
 wild parsnips

Perennial Weeds

*bindweed (hedge, field, European)
 blue lettuce
 *Canada thistle
 catnip
 chicory
 dandelion
 *docks
 *dogbanes

*goldenrod
 *ground ivy
 healall
 *hoary cress
 ironweed
 Jerusalem-artichoke
 many flowered aster

**nettles (including stinging)
 *orange hawkweed
 plantains
 sowthistle (perennial)
 *vervains
 *wild garlic
 *wild onion

*These species may require repeated applications and/or use of the higher rate recommended on this product label even under ideal conditions for application.

**Control of pigweeds in the High Plains area of Texas and Oklahoma may not be satisfactory with this product.

***Not registered for control of musk thistle in California.

SPECIFIC USE DIRECTIONS

NON-CROPLAND

fencerows, roadsides, drainage ditches, and other non-crop areas

WEEDS	AMOUNT OF WEEDAR® IVM 44 PER ACRE	DIRECTIONS
Annual broadleaf weeds	2 to 4 pints	Treat when weeds are young and actively growing. Perennial weeds should be near the bud stage, but not flowering at application. Do not use on susceptible southern grasses such as St. Augustine. Do not apply to newly seeded areas until grass is well established. Bentgrass, clover, legumes and dichondria may be injured by this treatment.
Biennial and perennial broadleaf weeds	4 to 8 pints	

RESTRICTIONS AND LIMITATIONS FOR USE ON NON-CROPLAND

Do not graze dairy animals for 7 days following application.

Use sufficient gallonage for thorough and uniform coverage.

SPOT TREATMENT IN NON-CROP AREAS

Mix 2 to 3 fluid ounces of WEEDAR® IVM 44 Broadleaf Herbicide in 3 gallons of water. Wet all weeds and stems thoroughly. For best results, treat when weeds are actively growing.

WEEDS IN ORNAMENTAL TURF AREAS

golf courses, cemeteries, parks, turfgrass, and other recreational turfgrass

NOT FOR USE ON TURF BEING GROWN (1) FOR SALE OR OTHER COMMERCIAL USE AS SOD, OR (2) FOR COMMERCIAL SEED PRODUCTION, OR (3) FOR RESEARCH PURPOSES.

WEEDS	AMOUNT OF WEEDAR® IVM 44 PER ACRE	DIRECTIONS
Annual broadleaf weeds	2 to 4 pints	Treat when weeds are young and actively growing. Perennial weeds should be near the bud stage, but not flowering at application. Do not use on susceptible southern grasses such as St. Augustine. Do not apply to newly seeded areas until grass is well established. Bentgrass, clover, legumes and dichondria may be injured by this treatment.
Biennial and perennial broadleaf weeds	4 pints	

RESTRICTIONS AND LIMITATIONS FOR USE ON ORNAMENTAL TURF AREAS

Do not apply more than 2 applications per year per treatment site. This does not exclude spot treatment.

Do not allow people (other than applicator) or pets on treatment area during application.

Do not enter treatment areas until sprays have dried.

WEEDS AND BRUSH IRRIGATION CANAL DITCHBANKS

(Seventeen Western States: Arizona, California, Colorado, Idaho, Kansas, Montana, Nebraska, New Mexico, Nevada, North Dakota, Oklahoma, Oregon, South Dakota, Texas, Utah, Washington, and Wyoming).

For control of annual and perennial broadleaf weeds, apply 1 to 2 quarts of WEEDAR® IVM 44 Broadleaf Herbicide per acre in approximately 20 to 100 gallons per acre. Treat when weeds are young and actively growing before the bud or early bloom stage. For harder-to-control weeds, a repeat spray after 3 to 4 weeks using the same rates may be needed for maximum results. Apply no more than two treatments per season.

For woody brush and patches of perennial broadleaf weeds, mix 1 gallon of WEEDAR® IVM 44 in 150 gallons of water. Wet foliage thoroughly using about 1 gallon of solution per square rod.

SPRAYING INSTRUCTIONS

Apply with low pressure (10 to 40 psi) power spray equipment mounted on a truck, tractor, or boat. Apply while traveling upstream to avoid accidental concentration of chemical into water. Spray when the air is fairly calm, 5 mph or less. Do not use on small canals (less than 10 cfs) where water will be used for drinking purposes.

Boom spraying onto water surface must be held to a minimum and no cross-stream spraying to opposite banks should be permitted. When spraying shoreline weeds, allow no more than 2 foot overspray onto water with an average of less than 1 foot overspray to prevent introduction of greater than negligible amounts of chemical into the water.

Do not allow dairy animals to graze on treated areas for at least 7 days after spraying. Water within treated banks should not be fished.

AQUATIC WEED CONTROL

For use in ponds, lakes, reservoirs, marshes, bayous, drainage ditches, canals, rivers and streams that are quiescent or slow moving.

NOTICE TO APPLICATORS

State and Local Coordination: Before application, coordination and approval of local and state authorities may be required, either by letter of agreement or issuance of special permits for such use.

Fish Toxicity - Oxygen Ratio: Fish breathe oxygen in the water and a water - oxygen ratio must be maintained. Decaying weeds use up oxygen. To avoid fish kill from decaying plant material do not treat more than one half the lake or pond at one time. For large bodies of weed infested waters leave buffer strips of at least 100 feet wide and delay treatment of these strips for 4 to 5 weeks or until the dead vegetation has decomposed.

Wind Velocity - Ground or Surface Application: Do not apply when wind speeds are at or above 10 mph. **Air Application:** Do not apply when wind speeds are at or above 5 mph. The restrictions do not apply to subsurface applications used in weed control programs.

Irrigation: Delay the use of treated waters for irrigation for three weeks after treatment unless an approved assay shows that the water does not contain more than 0.1 ppm 2,4-D acid. Do not treat irrigation ditches in areas where water will be used to overhead sprinkler irrigate susceptible crops especially grapes, tomatoes and cotton.

Potable Water: Delay the use of treated water for domestic purposes for a period of three weeks or until such time as an approved assay shows that the water contains no more than 0.1 ppm 2,4-D acid. If it is not possible to delay the use of treated water, do not make application closer than 3 miles from any potable water intake.

Water Hyacinth (*Eichornia crassipe*) - Directions For Use

WEEDAR® IVM 44 will control water hyacinth with surface and air applications.

Amounts to Use: 2 to 4 quarts (4 lb. acid equivalent per gallon) per acre. **Spray the weed mass only.** Use 4 quarts when plants are matured or when the weed mass is dense.

When To Apply: Spray when water hyacinth plants are actively growing. Repeat as necessary to kill regrowth and hyacinth plants missed in the previous operation.

How To Use - Surface Application: Use power sprayers operated with a boom or spray gun mounted on a boat, tractor or truck. Thorough wetting of foliage is essential for maximum control. Use 100 to 400 gal./A of spray mixture. Special precautions such as the use of low pressure, large nozzles and thickening agents should be taken to avoid spray drift in areas of sensitive crops. For Directa-Spra operation use WEEDAR® IVM 44 with 1 pint of drift control agent in 50 to 100 gallons of water. For other applications, follow the drift control agent label for mixing directions. **Air Application:** Use drift control spray equipment or thickening agents mixed into the spray solution. Apply 1.0 gallon per acre of WEEDAR® IVM 44 through standard boom systems with a minimum of 5 gallons of spray mix per acre. For MICRO-FOIL™ drift control spray systems, apply WEEDAR® IVM 44 in 12 to 15 gallons spray mix per acre.

2,4-D Acid Equivalent	1/2 lb.	1 lb.	2 lbs.	3 lbs.	4 lbs.
WEEDAR® IVM 44	1 pt.	2 pts.	2 qts.	3 qts.	4 qts.

Water Milfoil (*Myriophyllum spicatum*) - Directions For Use

For Eurasian Water Milfoil in programs conducted by the Tennessee Valley Authority in dams and reservoirs of the TVA system. WEEDAR® IVM 44 will control water milfoil with surface, subsurface and air applications.

How To Use: To control water milfoil when less than 5 gallons of concentrate per acre is recommended, dilute the concentrate with water to apply a minimum of 5 gallons of spray mix per acre. Do not treat within 1/2 mile of potable water intakes. Shoreline areas should be treated by sub-surface injection applied by boat to avoid aerial drift. Do not apply when weather conditions favor drift from target area. Do not contaminate water by cleaning of equipment washwaters.

Open Water Areas: To reduce contamination and prevent undue exposure to fish and other aquatic organism, do not treat water areas that are not infested with aquatic weeds.

Amounts To Use: Apply 2.5 to 10 gallons of WEEDAR® IVM 44 per acre. The higher rate is used in areas of greater water exchange. These areas may require a repeat application.

When To Apply: For best results, apply in spring or early summer when milfoil starts to grow. This timing can be checked by sampling the lake bottom in areas heavily infested with weeds the year before.

Subsurface Application: Apply 2.5 to 10 gallons of WEEDAR® IVM 44 per acre as a concentrate directly into the water through boat mounted distribution systems.

Surface Application: Apply 2.5 to 10 gallons of WEEDAR® IVM 44 per acre in a minimum spray volume of 5 gallons mix per acre.

Air Application: Use drift control spray equipment or thickening agents mixed into the spray solution. Apply 2.5 to 10 gallons per acre of WEEDAR® IVM 44 through standard boom systems with a minimum of 5 gallons of spray mix per acre. For MICRO-FOIL™ drift control spray systems apply WEEDAR® IVM 44 in 12 to 15 gallons spray mix per acre.

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 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.

BEST AVAILABLE COPY

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WEEDAR is a registered trademark of Rhône-Poulenc.
WEEDAR brand IVM 44 Broadleaf Herbicide (PENDING) Submitted 2/26/93.