



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

MAR 23 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Molly Hickman  
CHAS H. LILLY CO.  
7737 N.E. KILLINGSWORTH  
PORTLAND, OR 97218

Subject: Label Amendment Submission of 10/11/93 in Response to PR Notice 93-7  
EPA Reg. No. 802-241  
LILLY/MILLER ENVY 2,4-D

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling
- AND
- WITHIN one year from date of this acceptance.



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

2 7 12

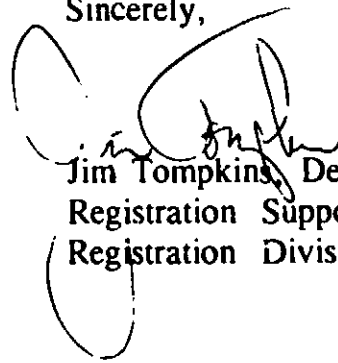
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



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

Attachment

3 7 12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

Molly Hickman  
CHAS H. LILLY CO.  
7737 N.E. KILLINGSWORTH  
PORTLAND OR 97218

Comment for: EPA Reg Nr.802-241  
LILLY/MILLER ENVY 2, 4-D

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

The glove requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or does not match the chemical-resistance category identified on your proposed labeling. Correct the chemical-resistant category statement (if necessary) to state: "Some materials that are chemical resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart." Remove the incorrect glove requirement (if any) and add "Chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride, or viton." The exact location is shown in Sections A and B on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.8

The Agricultural Use Requirements section must be located in a clearly separate box on the product labeling -- with lines or other graphic indicators (such as contrasting color) to separate the section from the surrounding text.

The Non-Agricultural Use Requirements section must either be placed in a box or printed on the label in a contrasting color from the surrounding text.

LILLY/MILLER  
ENVY 2,4-D

ACTIVE INGREDIENTS:

Triethylamine Salt of 2,4-Dichlorophenoxyacetic Acid* . . . . .	48.65%
2,4-Dichlorophenoxyacetic Acid . . . . .	9.50%
INERT INGREDIENTS . . . . .	41.85%

\*2,4-Dichlorophenoxyacetic Acid equivalent 33.36%. Total 2,4-Dichlorophenoxyacetic Acid equivalent and Actual 42.86% - 3.8 lbs./gal. + Isomer specific by AOAC Method No. 6. D01-5.

A special formulation for selective control of . . .

Russian Knapweed	Blue Flowering Lettuce	St. Johnswort
Wild Garlic	Morning Glory	White Top
Leafy Spurge	Wild Onion	Tansy Ragwort
Canada Thistle		

in Wheat, Barley, Grass Seed Crops, Corn, Apples, Pears, Grapes, Stone Fruits, Nuts, Pastures, Turfs, Fallow and Non-crop Land.

Store at temperatures above 40 degrees F.

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 some one to explain it to you in detail.)

See back side panel for Statement of Practical Treatment and additional Precautionary Statements.

NET CONTENTS \_\_\_\_\_ GALLON(S)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER: Corrosive, causes eye damage. Do not get in eyes, on skin, or on clothing. Avoid breathing vapor or spray mist. Harmful if swallowed.

STATEMENT OF PRACTICAL TREATMENT

If swallowed, call a Physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat. Do not induce vomiting or give anything by mouth to an unconscious person. In case of contact, wash skin with soap and water; for eyes, flush with water for 15 minutes and get medical attention.

Personal Protective Equipment

Applicators and other handlers must wear: Long-sleeved shirt and long

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

MAR 23 1994  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
802-24

pants; chemical resistant gloves, such as barrier laminate, butyl rubber >/= 14 mils, nitrile rubber >/= 14 mils, neoprene rubber >/= 14 mils, polyvinyl chloride (PVC) >/= 14 mils, viton >/= 14 mils; shoes plus socks; protective eyewear; chemical-resistant headgear for overhead exposure; chemical-resistant apron when cleaning equipment, mixing, or loading. Discard clothing and other absorbant 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. After each day of use, clothing or PPE must not be used until it has been cleaned.

Engineering controls statements:

For containers of 5 gallons or more in capacity: A closed 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. The mechanical system must be used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)]. The handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use enclosed cabs or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR Part 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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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.
- \* Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

=====  
ENVIRONMENTAL HAZARDS

Do not apply when weather conditions favor drift from target areas. Drift or runoff may adversely affect nontarget 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.

Most cases of groundwater 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 groundwater supplies. Use of closed systems for mixing or 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 groundwater contamination.

PHYSICAL OR CHEMICAL HAZARD

FLAMMABLE. Keep away from heat and open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product through any type of irrigation system. 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 this 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 specific 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 worker 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; chemical resistant gloves, such as barrier laminate, butyl rubber >= 14 mils, nitrile rubber >= 14 mils, neoprene rubber >= 14 mils, polyvinyl chloride (PVC) >= 14 mils, viton >= 14 mils; shoes plus socks; protective eyewear; and chemical resistant headgear for overhead exposure.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not allow people (other than applicator) or pets on treatment area during application, do not enter treatment areas until spray has dried.

GENERAL USE DIRECTIONS . . . . USE WITH WATER ONLY

TO PREPARE SPRAY: Fill spray tank with half required amount of water. Add the recommended amount of Lilly/Miller ENVY 2,4-D while agitating, then continue filling the spray tank with water. If spray mixture is allowed to stand for extended period of time it should be re-agitated or mixed before using. Mix only the volume of spray that will be used in a day's operation. Clean and flush the sprayer after using or at the end of each day's operation. NOTE: Spray equipment should not be used for any other purposes unless thoroughly decontaminated. Such equipment should not be used for application of insecticides, fungicides, or other agricultural chemicals. NOTE: A suitable drift reducing agent, such as BIVERT or STA-PUT may be used to help reduce drift when applying in sensitive areas.

PERENNIAL WEEDS: Apply when majority of weeds have emerged and are growing vigorously. This is usually at the stage of growth when first flower buds show signs of opening. Perennial weeds are persistent growers. Two applications a year for two or more years may be needed for satisfactory control. When treating of regrowth is necessary, spray during a period of active growth but before fall dormancy. For specific advice, consult State Agricultural Experiment Station or State Extension Service Weed Specialists as climate and local conditions may cause the listed recommendations to vary.

USE PRECAUTIONS

Please read entire label. Use only as directed, noting all precautions. Do not apply directly to or otherwise permit sprays to come in contact with vegetables, flowers, grapes, fruit trees, caneberries, ornamentals or other desirable plants which are sensitive to 2,4-D and do not permit spray mist to drift onto them, since even minute quantities of the spray may cause severe injury during both growing and dormant periods. Coarse sprays are less likely to drift. Do not contaminate irrigation ditches or water used for domestic purposes. Excessive amounts of 2,4-D in the soil may temporarily inhibit seed germination or plant growth. At higher temperatures, vaporization may cause injury to susceptible plants growing nearby. Keep container tightly closed when not in use. Be sure that use of this product conforms to all applicable local regulations.

WEED CONTROL IN CROP AREAS

WHEAT, BARLEY

Use 1 to 3 pints in a minimum of 5 gallons per acre. Apply when grain is in full tiller stage (4 to 8 inches tall) and when weeds are still small. Preharvest or late applications to control large weeds may be effective under certain conditions such as succulent weed growth and adequate soil moisture (make application in dough stage).

Perennial Broadleaf Weeds: Apply 3 pints per acre when weeds are approaching bud stage, but do not spray grain in the boot to dough stage. The 3 pint per acre application rate may injure wheat. Balance the severity of the weed problem against the possibility of crop damage. Where weeds are scattered, spot treatment is suggested to minimize crop injury.

NOTE: Do not apply in seedling or boot to milk stage. Do not graze or feed forage from treated fields within 2 weeks after treatment. When late or preharvest applications are made (dough to harvest) do not use treated straw for livestock feed.

CORN

FIELD - Postemergence Application (Emergence to Tasseling) - Use 1 pt. in 20 to 40 gallons of water per acre just as soon as corn plants are breaking ground. For later applications, use drop nozzles to keep spray off foliage when corn is over 8 to 10 inches tall. Do not apply from tasseling to dough stage. After early dough stage - Use 1 qt. in 20 to 40 gals. of water per acre. Apply with drop nozzles to keep spray off foliage.

POP - Postemergence Applications - Use 1 pt. in 20 to 40 gals. of water per acre. Spray when corn is 3 to 10 inches tall.

SWEET - Postemergence Application - Use 3/4 pt. in 20 to 40 gals. of water per acre. Use drop nozzles to keep spray off foliage of corn. Do not apply from tasseling to dough stage. After early dough stage - Use 0.8 pt. in 20 to 40 gals. of water per acre. Apply with drop nozzles to keep spray off foliage.

PRECAUTION: Do not forage or feed treated corn fodder for 7 days following application. Corn varieties vary in their tolerance to 2,4-D. Before applying this product get information on the 2,4-D tolerance of specific varieties and spray only those known to be resistant to injury by 2,4-D.

GRASS SEED CROPS - Use 1 to 1 1/2 pts. in 20 to 40 gals. of water per acre. Where irrigation is practiced regularly, application may be made after the two leaf stage.

Fall-seeded Grass Seed Stands in Western Oregon - Use 1 pt. in 20 to 40 gals. of water per acre any time after 2 leaf stage.

Established Grass Seed Stands - Use 1 to 1 1/2 pts. in 20 to 40 gals. of water per acre. Application may be made in the fall or early spring, prior to the time seed heads appear in the boot.

NOTE: Follow grazing and cutting restrictions noted under Pastures, Turfs, Rangeland section. Do not apply when grass is in boot to milk stage. Do not apply to newly seeded areas or after heading begins.

WEED CONTROL IN ORCHARDS AND VINEYARDS

GRAPE VINEYARDS - Established at least 3 years - Field Bindweed (Morning Glory), Canada Thistle and other 2,4-D susceptible broadleaf weeds. Dilute 2 to 3 pts. in 20 to 80 gals. of water per acre of ground sprayed. For band or spot treatment, calculate rates



according to the actual portion of an acre treated. Apply when weeds are in the bud to early bloom stage and growing vigorously. Apply after shatter following bloom and before grape shoots reach the ground or during dormant season. Use a hooded boom and low pressure flooding nozzles to deliver coarse droplets. USE PRECAUTIONS: Grapes are extremely sensitive to 2,4-D. Use a direct application so no 2,4-D contacts grape leaves and young shoots or stems.

APPLE AND PEAR ORCHARDS - Broadleaf Weeds:  
NON-BEARING TREES (well established - one year or older), and BEARING TREES before and after bloom - Use 1 1/2 qts. in 20 to 50 gals. of water per acre of ground sprayed. For band or spot treatment calculate rates according to the actual portion of an acre treated. Apply as a directed spray onto the weeds to point of runoff when weeds are young and actively growing (pre-bud to early stage). Repeat applications through the growing season as needed. Do not apply in orchards where Gala apples are growing.

STONE FRUIT AND NUT ORCHARDS - Broadleaf weeds. Use 1 1/2 qts. in 20 to 50 gals. of water per acre of ground sprayed. For band or spot treatment, calculate rates according to the actual portion of an acre treated. Apply as a directed spray onto the weeds to point of run-off when weeds are young and actively growing (pre-bud to early bud stage). Make up to two applications through the dormant or growing seasons as needed. Do not harvest stone fruits within 40 days of application. Do not harvest nuts within 60 days of application. Do not graze or feed cover crops from treated orchards to livestock.

FILBERTS - Sucker Control. Mix 1 quart in 100 gallons of water plus 8 oz. of non-ionic spreader activator. Spray to run-off when suckers are 6 to 9 inches tall. Spray when needed, from April through August. Use large orifice nozzles (.04 nozzle) and low tank pressure (30-35 lbs.) to produce large droplet size. For orchard floor weed control, see above section on broadleaf weed control in "Stone Fruit and Nut Orchards" Section. Apply no more than four times per year. Do not harvest filberts within 45 days of last application. Do not allow livestock to graze in treated areas, or the feeding of cover crops grown in treated orchards.

PRECAUTIONS IN APPLYING 2,4-D IN ORCHARDS AND VINEYARDS  
Apply only after irrigation and allow maximum time before the next irrigation. Do not apply around fruit trees or vines with hand gun. Use only flat, fan-type nozzles and low pressures - 20 to 30 lbs. Use a fixed boom applicator which can be calibrated and which will deposit the spray uniformly. Avoid contact with fruit, foliage, stems or lower limbs of trees or vines. Apply precisely and uniformly to prevent damage to the trees or vines and to obtain satisfactory weed control. Do not apply during windy periods or extremely high temperatures. Do not spray bare ground. To avoid

leaching do not apply to DRY desert valley, shallow or sandy soils. Apply to these soils when moist, after irrigation or rain and allow maximum time before next irrigation.

WEED CONTROL IN PASTURES, TURFS, RANGELAND, FALLOW LAND

PASTURES, TURFS, RANGELAND

Use 2 qts. in 20 to 40 gallons of water per acre. (For small areas use 3 tablespoons per 1,000 sq. ft. in 3 to 5 gallons water and apply uniformly over the area). ON TURF (OTHER THAN SOD FARMS - SEE AGRICULTURAL USE REQUIREMENTS): THE MAXIMUM NUMBER OF BROADCAST APPLICATIONS PER TREATMENT SITE IS 2 PER YEAR. Apply when weeds are actively growing and (1) when annual weeds have not yet produced flower heads; (2) when perennials are near bud stage. Repeated treatments may be necessary for less susceptible weeds. Apply only to established pastures and turf. The use of 2,4-D may injure white and subterranean clover in a pasture, but clover damage is usually temporary. This treatment will kill Birdsfoot Trefoil, Big Trefoil, Red Clover and Alfalfa. In some areas Bent, Carpet Buffalo, Dichondra and St. Augustine Grasses may be injured. NOTE: Do not graze dairy cattle in treated areas for 7 days after application. Remove meat animals from freshly treated areas for 3 days before slaughter. Withdrawal is not needed if 2 weeks or more has elapsed since the treatment was applied. Do not cut treated grass for hay within 30 days after application.

TANSY RAGWORT CONTROL - Use 1 1/2 to 2 qts. per acre. Use lower rate when extensive clover injury cannot be tolerated. Apply in the spring (late March to early May) during the rosette stage before any flowers appear. The earlier the application in relation to plant growth, the better the kill. Make a thorough spray application to wet all the foliage thoroughly. An application can be made in the early fall after the beginning of regrowth (crowns) or newly germinated seeds. Treatment in the fall will be less damaging to clover. Another application in the spring may be necessary to control seedlings. Respraying for more than one year is necessary to control germinating seeds. NOTE: Follow grazing restrictions given under Pastures, Turfs, Rangeland section above.

FALLOW LAND

Dilute 2 to 3 qts. Lilly/Miller ENVY 2,4-D in 10 or more gals. of water per acre by ground or 5 or more gals. of water by air. Do not plant any crops until 3 months after treatment or until chemical has disappeared from soil.

WEED CONTROL IN NONCROP AREAS

Fence Rows, Roadsides, Drainage Ditchbanks and Other Non-Crop Areas

SPOT SPRAYING: Dilute 3 to 4 qts. Lilly/Miller ENVY 2,4-D in 100 gals. water (2 to 3 tablespoons in 1 gal). Spray to completely wet

all foliage.

BOOM SPRAYING: Dilute 2 to 4 qts. Lilly/Miller ENVY 2,4-D in 10 or more gals. water per acre by ground or 5 or more gals. of water by air. Spray to obtain complete coverage.

TANSY RAGWORT CONTROL - Use 1 1/2 to 3 qts. per acre. Use lower rate when extensive clover injury cannot be tolerated. Apply in the spring (late March to early May) during the rosette stage before any flowers appear. The earlier the application in relation to plant growth, the better the kill. Make a thorough spray application to wet all the foliage thoroughly. An application can be made in the early fall after the beginning of regrowth (crowns) or newly germinated seeds. Treatment in the fall will be less damaging to clover. Another application in the spring may be necessary to control seedlings. Respraying for more than one year is necessary to control germinating seeds. NOTE: Follow grazing restrictions given under Pastures, Turfs, Rangelands section above.

STORAGE AND DISPOSAL

STORAGE: Store at temperatures above 40 degrees F. Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law and may contaminate groundwater. 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: Plastic: 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 burning. If burned, stay out of smoke.

Metal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

LIMIT OF WARRANTY AND LIABILITY

The Chas. H. LILLY Co. (LILLY) warrants that this product conforms to the chemical or other description on the label (and/or instructions) and is reasonably fit for the purposes set forth on the label (and/or instructions) under the conditions described there. NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the following conditions:

\*Buyer and all users shall promptly notify LILLY of any claims whether based in contract, negligence, strict liability, other tort, or otherwise.

\*THE EXCLUSIVE REMEDY OF THE USER OR BUYER AND THE LIMIT OF LIABILITY OF LILLY FOR ANY LOSS, INJURY OR DAMAGE RESULTING FROM THE USE OR

HANDLING OF THIS PRODUCT (including claims based upon contract, negligence, strict liability, other tort, or otherwise) SHALL BE:

1. The purchase price paid for the product, or at the election of LILLY

2. The replacement of such quantity of the product as is involved.  
IN NO EVENT SHALL LILLY BE LIABLE FOR ANY INCIDENTAL OR CONSEQUENTIAL DAMAGES.

\*LILLY agents have no authority to give warranties or make representations on its behalf, concerning the use, quality or performance of this product, or any other respect.

\*The use, handling, storage, and other influencing factors are beyond the control of LILLY. Buyer assumes all risk of loss, injury, or damage due to use, handling, storage and other influencing factors, including but not limited to, incompatibility with other products, and weather conditions.

NOTICE: Follow directions carefully. Timing and method of application, weather and crop conditions, mixture with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

THE CHAS. H. LILLY CO.  
PORTLAND, OREGON 97218  
EPA Est. 802-OR-1  
EPA Reg. No. 802-241  
37696