

MAY 06 1991

Ms. Molly Klettke  
The Chas. H. Lilly Company  
7737 NE. Killingsworth  
Portland, OR 97218

Dear Ms. Klettke:

Subject: Label Amendment- based on Agency letter dated 2/8/91  
Miller's MCP Sodium Salt 2  
EPA Registration Number 802-374  
Your Submission Dated April 24, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records.

Please note that further label revisions might be necessary upon submission of outstanding toxicology data which includes, acute oral, acute dermal and acute inhalation studies.

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Enclosure

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CONCURRENCES

SYMBOL	H7505C						
SURNAME	Robbins						
DATE	5/3/91						

MILLER'S MCP SODIUM SALT 2  
(2 lbs. MCP acid equivalent per gallon)

ACTIVE INGREDIENT:  
2-methyl-4-chlorophenoxyacetic acid, sodium salt . . . . 23.2%  
INERT INGREDIENTS . . . . 76.8%  $\xrightarrow{\hspace{10em}}$   
Equivalent to 21% 2-methyl-4-chlorophenoxyacetic acid

WEED KILLER

For selective control of Broadleaf Weeds in PEAS, FLAX, RICE, OATS,  
WHEAT, BARLEY, ESTABLISHED PASTURES, TURFS AND OTHER NON-CROP AREAS.

Limited to use by commercial applicators, landscapers, or professional  
turf maintenance personnel.

KEEP OUT REACH OF CHILDREN

DANGER-PELIGRO

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

STATEMENT OF PRACTICAL TREATMENT

If in eyes: Flush with plenty of water. Get medical attention. If  
swallowed: Call a physician or Poison Control Center. Drink promptly a  
large quantity of milk, egg whites, gelatin solution, or if these are  
not available, drink large quantities of water. Avoid alcohol. NOTE TO  
PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric  
lavage.

See side panel for Additional Precautionary Statements.

NET CONTENTS      GALLON(S)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:  
*May 6, 1991*  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
802-374

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**DANGER:** Corrosive. Causes irreversible eye damage. Do not get in eyes, on skin or clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Do not breathe spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

**ENVIRONMENTAL HAZARDS**

Do not apply when weather conditions favor drift from target areas. Drift or runoff may adversely affect nontarget plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

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 groundwater 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 groundwater contamination.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**SHAKE WELL BEFORE USING.**

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. 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 other procedures approved by State and local authorities.

**CLEANING OF EQUIPMENT:** When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

**GRASSES GROWN FOR SEED**

1. Use 2 to 4 pints per acre in sufficient water to give adequate coverage. Use higher rate where weed stands are heavy.

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2. In established grasses, apply in early spring or in the fall prior to the time seed heads appear in the boot. On new seedling grass, apply after grass has 5 leaves.

NOTE: MCP may injure bentgrass at the higher rates. Do not graze dairy animals in treated areas until 7 days after treatment. Do not graze meat animals in treated areas within 7 days of slaughter.

**ESTABLISHED GRASSLANDS AND PASTURES**

1. Use 2 to 6 pints per acre in sufficient water (10 to 100 gallons) to give thorough coverage. Use higher rate for Canada Thistle and other hard-to-kill weeds.

2. Spray perennials in bud stage and regrowth in fall; other weeds in spring or fall.

NOTE: Alfalfa, Alsike, Red, Crimson, Sub-clovers are injured by MCP.

**ESTABLISHED LAWN AND TURFS**

1. Use two fluid ounces in 3 to 5 gallons of water, apply uniformly over 1,000 sq. ft. For larger areas, use 2 to 6 pints per acre in 10 to 100 gallons of water.

2. Apply spring or fall when weeds are actively growing. Do not mow within two days before or after application.

**NON-CROP SPRAYING - Canada Thistle, White Top, Meadow Buttercup, Field Bindweed (Morning-glory).**

1. For spot treatment, use 1/2 pint in 3 to 4 gallons of water or 1 1/2 gallons per acre in sufficient water to give coverage. Spray to wet weeds thoroughly.

2. Apply when weeds are in bud to early bloom and again on fall regrowth.

NOTE: Do not forage or graze meat or dairy animals on treated areas within 7 days of treatment.

**MIXING DIRECTIONS**

Mix with water only. Add one-half required amount of water to spray tank, then add specified amount of this product with agitation, finally adding the balance of the water with continued agitation. Apply during warm weather when weeds are growing actively.

**APPLICATION DIRECTIONS**

Do not apply directly to or otherwise permit sprays to come in contact with vegetables, flowers, grapes, fruit trees, canberries, ornamentals or other desirable plants which are sensitive to MCP 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 apply by airplane in the vicinity of grapes or other desirable MCP susceptible plants.

Do not contaminate irrigation ditches or water used for domestic purposes. Excessive amounts of MCP in the soil may temporarily inhibit seed germination or plant growth.

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At higher temperatures vaporization may cause injury to susceptible plants growing nearby. Keep container tightly closed when not in use. Do not use spray equipment for any other purpose. Such equipment should not be used for application of insecticides, fungicides, or other agricultural chemicals. Do not apply MCPA sodium salt with nozzles that produce a fine spray. Do not apply this product through any type of irrigation system.

**SPECIFIC DIRECTIONS**

**RICE** - For the control of Water Plantain, Arrowhead Lily, Red Stem and certain susceptible sedges. 1. Use 3 to 5 pints in 10 to 30 gallons of water per acre. 2. Apply 55 to 65 days after planting when Rice is full tillered and 6 to 8 inches above water, or when crop stems begin to elongate. Do not apply after Rice is in boot stage. Do not spray when temperature is over 90 F.

**NOTE:** Do not use in rice fields where shellfish are of economic importance. Do not grow crayfish or catfish in treated rice fields.

**FLAX** - For control of Mustard, Lambsquarters, and other susceptible weeds.

- 1. Use 2 to 4 pints per acre in 20 to 70 gallons of water by ground equipment; or 10 gallons of water by air.
- 2. Apply when crop is 4 to 8 inches tall but before bud stage.
- 3. Do not forage or graze meat or dairy animals on treated area within 7 days of slaughter.

**WHEAT, OATS and BARLEY** - For control of Mustard, Lambsquarters, and other susceptible weeds.

- 1. Use 2 to 4 pints per acre in 5 to 20 gallons of water by ground equipment, or 3 or more gallons water by air. For OATS, use 2 pints per acre. Apply from full tiller to boot stage. Do not spray from boot to dough stages.
- 2. For less susceptible weeds, use up to 6 pints per acre after crop has tillered and up to early boot stage. The 6 pint per acre application rate can produce injury to wheat.

**NOTE:** Do not forage or graze meat animals on treated areas within 7 days of slaughter. Do not forage or graze dairy animals on treated areas within 7 days after treatment.

**PEAS** - For control of Mustard, Lambsquarters and other susceptible weeds.

- 1. Use 1/2 to 1 pint in 20 to 60 gallons of water per acre. For aerial application use 10 gallons total spray solution per acre. Adjust dosage rates to air temperatures as follows:  
Less than 55 F - 1 pint per acre; 55 F to 70 F - 4/5 pint per acre; 70 F to 80 F - 1/2 pint per acre.
- 2. Apply after weeds emerge and before they are 3 inches tall. Do not apply later than the 3 node stage of growth of the peas before blooming period.
- 3. Do not apply to peas that are stressed from lack of moisture.

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4. Do not feed treated vines to livestock. Do not graze or forage treated pea fields.

NOTE: Consult State Extension Service personnel or cannery company fieldmen for proper timing of applications with regard to varietal differences of growth rate.

NOTICE: Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures 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 or handling of this material not in strict accordance with directions given herewith.

#### 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) when used strictly in accordance with 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 in 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.

THE CHAS. H. LILLY CO.  
Portland, OR 97218  
EPA Est. 802-OR-1  
EPA Reg. No. 802-374  
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