

FEB 13 1996

Gene R. Currie
Cenex/Land O'Lakes
P.O. Box 98
Shenandoah, IA 51601-0089

Dear Mr. Currie:

SUBJECT: Label Amendment - Use Deletion (Flax)
Class MCPE
EPA Registration No. 1381-98
Your Application Dated August 8, 1995

The labeling referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable with the following provisions:

1. Under the "Ingredients Statement", add the statement, "Product Contains Petroleum Distillates".
1. In following the guidelines of OPP's label review manual the "Precautionary Statements" and the "Statements of Practical Treatment (First Aid)" should be clearly differentiated on the labeling.
 - a. The "Precautionary Statements" should be revised as follows:

"Harmful if swallowed, inhaled, or absorbed through skin. Causes skin irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling."

No "Eye Irritation" statement is required since the product is classified as toxicity category IV. However you may choose the following category II statement:
"Causes eye irritation."

CONCURRENCES

SYMBOL	7505C							
SURNAME	DMorgan							
DATE	Feb 7, 1996							

- b. A "Statements of Practical Treatment" is required for each route of exposure. A header is required, and any of the following are acceptable: "Statement of Practical Treatment, Practical Treatment, of First Aid". Add the following statements to the labeling:

"IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

An eye irritation statement is not required. However, you may use the category III statement, "Flush eyes with plenty of water. Call a physician if irritation persists.", if you choose.

- c. A "Note to Physician" is required for products that are in acute toxicity category III and contain $\geq 10\%$ petroleum distillates. The following statement should appear below the last statement of practical treatment:

"Note to Physician: Probably mucosal damage may contraindicate the use of gastric lavage."

2. Move the last sentence under the heading, "Pesticide Disposal" ("Do not contaminate water, food, or feed by storage or disposal.") to a position immediately below the heading, "STORAGE AND DISPOSAL".

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment.

Sincerely yours,

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

Enclosure

BEST COPY AVAILABLE

CLASS
CROP PROTECTION

In EPA Letter Dated
FEB 13 1996

(R)
CLASS
MCPE
PHENOXY HERBICIDE
For Wheat, Barley, Oats, and Rye

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1381-98

ACTIVE INGREDIENT:

2-methyl-4-chlorophenoxyacetic acid*	
isooctyl (2-ethylhexyl) ester.....	68.7%
INERT INGREDIENTS:	31.3%
Total.....	100.0%

*Equivalent to 44.1% of 2-methyl-4-chlorophenoxyacetic acid
or no less than 3.7 lbs. of MCPA acid per gallon at 68oF.
*Isomer specific by A.O.A.C. Method No. 6.A18-22 (13th ed.)

KEEP OUT OF REACH OF CHILDREN
WARNING AVISO

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.)

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

(R) CLASS is a registered trademark of Cenex/Land O'Lakes Agronomy Company

EPA Reg. No. 1381-98
EPA Est. 407-IA-1S, 2H, MN-1
Superscript corresponds to letter in lot number

B-95WPS
Deletion Copy

Distributed by
CENEX/LAND O'LAKES AGRONOMY CO.
St. Paul, MN 55164

NET CONTENTS _____

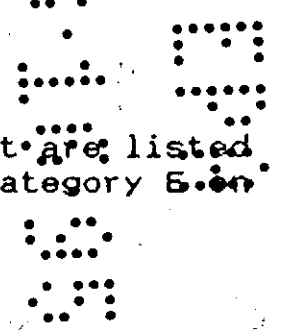
PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING

Harmful if swallowed. If swallowed, do not induce vomiting. If vomiting
occurs spontaneously, keep airway clear. Never give anything by mouth to
an unconscious person. Call physician immediately.

Causes eye and skin irritation. Do not get in eyes, on skin or clothing.
In case of contact, immediately flush eyes or skin with plenty of water for
at least 15 minutes. For eyes, call a physician. Get medical attention if
skin irritation persists.

Personal Protective Equipment:

Some materials that are chemical-resistant to this product are listed
below. If you want more options, follow the instructions for category 5 on
a EPA chemical resistance category selection chart.



LAST COPY AVAILABLE

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves, such as neoprene, nitrile rubber, barrier laminate, or viton.
- Shoes plus socks.
- Protective eyewear.

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 or maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statement:

- 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 requirements 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.
- 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

This product is toxic to aquatic invertebrates. Drift or runoff adversely affect aquatic invertebrates and non-target plants. For terrestrial uses, do not apply directly to water, 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 or rinsate.

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.

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.

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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 apply only 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 12 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 neoprene or nitrile rubber or barrier laminate or viton.
- Shoes plus socks.
- Protective eyewear.

STORAGE AND DISPOSAL

STORAGE: Store in a secure area, in original container only, away from fertilizers, food, or feed.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of 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. Do not contaminate water, food, or feed by storage or disposal.

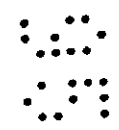
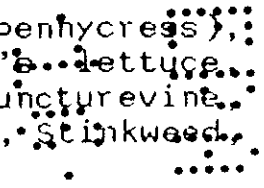
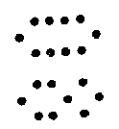
CONTAINER DISPOSAL: Metal Containers: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Plastic Containers: 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.

This product is recommended for controlling the following as well as many other plants susceptible to MCPA.

ANNUAL AND BIENNIAL WEEDS

Annual sowthistle, Beggarticks, *Chervil, Cocklebur, Fanweed (penhycress), *Goatsbeard, *Hempnettle, Lambsquarter, *Marshelder, Miner's lettuce, Mustards (except blue), Pepperweed (field), Poison hemlock, *Puncturevine, Pigweed, *Purslane, Ragweed, **Russian thistle, *Shepherdspurse, *Stinkweed, Sunflower, Wild radish.



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PERENNIAL WEEDS

Buttercup, *Canada Thistle, Dandelion, Dragonhead mint, Stinging nettle, Perennial sowthistle, Plantains, Vetch, *Whitetop (Hoary cress), *Yellow Rocket (Wintercress).

* Use the higher rate for control. Repeat treatments may be necessary.
 ** Regrowth may occur after repeat applications.

USE PRECAUTIONS

Unless noted otherwise under individual DIRECTIONS section, for aerial application, apply the recommended amount in a minimum of 2 gallons of water per acre. For ground application, apply the recommended amount in a minimum of 10 gallons of water per acre. Use more water for both methods when adverse growing conditions are present. DO NOT apply with high spray pressures, hollow cone or other nozzles types that produce small spray droplets which may drift. Avoid spray drift by making applications when conditions such as wind, air stability and temperature inversions are not a factor. The use of a suitable drift control agent at the proper rate will aid in the reduction of spray drift.

Do not apply this product through any type of irrigation system.

MIXING INSTRUCTIONS

WATERBASED SPRAY -- Fill the equipment half full of water, agitate while adding this product, then add rest of water.

Wash spray equipment thoroughly with CLASS R PROTANK TM cleaner after using this product. When cleaning, do not pour washwater on the ground: spray or drain over a large area away from wells or other water sources.

Consult local agricultural experiment station or extension service weed specialists for use recommendations in your area.

Note: When stored at temperatures below freezing, it may be necessary to warm contents to 70oF and mix thoroughly before using.

SMALL GRAINS

WEEDS	AMOUNT OF CLASS (R) MCPE PER ACRE	DIRECTIONS
Fall planted wheat, oats, barley and rye		
Annual weeds	1/2 pint	Apply when weeds are small.
Annual and biennial weeds	1 to 1-1/2 pints*	Apply after crop has reached the 3 to 5 leaf stage up to the early boot stage (Zadocks 13 to 40).
Perennial weeds	3 pints*	For less susceptible weeds, use the 3 pint rate after the crop has tillered and up to early boot stage (Zadoks 25 to 40). Do not spray from boot stage to dough stage (Zadoks 40 to 80).

* The higher rate may cause grain injury.

RESTRICTIONS AND LIMITATIONS FOR SMALL GRAINS

Do not forage or graze treated areas for 7 days after application.

PASTURES, RANGELAND, CONSERVATION RESERVE PROGRAMS AND SET-ASIDE ACRES

WEEDS	AMOUNT OF CLASS (R) MCPE PER ACRE	DIRECTIONS
Established grasses*		
Annual and biennial weeds	1 to 3 pints	Apply to established grasses before the head comes into boot and on seedling grasses, after the grass has at least 5 leaves (tillered).
Canada thistle and whitetop (hoary-cress)	3 pints	Use higher rate for Whitetop, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and during active re-growth in fall.

* Do not use on alfalfa, clover, other legumes or newly seeded areas.

RESTRICTIONS AND LIMITATIONS FOR

PASTURES, RANGELAND, CONSERVATION RESERVE PROGRAMS AND SET-ASIDE ACRES

Do not forage or graze treated areas for 7 days after application.

GRASSES GROWN FOR SEED

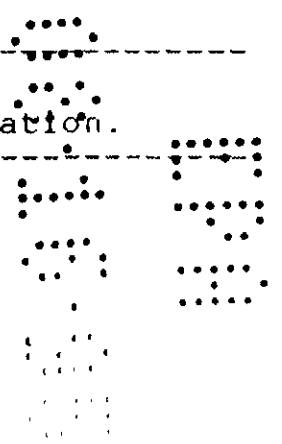
Do not use on alfalfa, clover, other legumes or newly seeded areas.

WEEDS	AMOUNT OF CLASS (R) MCPE PER ACRE	DIRECTIONS
Annual and perennial weeds	1 to 2 pints**	Apply to established grasses before the head comes into boot. Do not spray in boot stage. Apply to seedling grasses after grass has at least 5 leaves. Use the higher rate where weeds stands are heavy.

** Repeat treatment may be needed for less susceptible weeds. In some cases Bent, Buffalo, Carpet and St. Augustine grasses may be injured by this treatment.

RESTRICTIONS AND LIMITATIONS FOR SEED GRASSES

Do not forage or graze treated areas for 7 days after application.



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NON-CROP USES

Fence Rows, Roadsides, Rights-of-Way and Other Non-Crop Areas

WEEDS	AMOUNT OF CLASS (R) MCPE PER ACRE	DIRECTIONS
Extensive areas	3/4 gallon	Apply in minimum of 2 gallons of water per acre by air and from 20 to 100 gallons of water by ground. Spray when weeds are in bud to early bloom and again during active fall regrowth.
Spot treatment Canada thistle, whiteweed (hoary- cress) and buttercup	1/2 pint	Apply in 3 to 4 gallons of water. Spray to thoroughly wet weeds.

RESTRICTIONS AND LIMITATIONS FOR NON-CROP AREAS

Do not forage or graze treated areas for 7 days after application.

LIMIT OF WARRANTY AND LIABILITY

This Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Direction for Use label copy and/or booklet ("Use Directions") when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE OF MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated therein.

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

Buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop, or treated vegetation.

THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF LIABILITY OF OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL CONSEQUENTIAL OR SPECIAL DAMAGES.

Buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

In case of emergency involving this product or for user safety information on this product, contact Cenex/Land O'Lakes via CHEMTREC at 1-800-424-9300.