

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

22 SEP 1992

Gene R. Currie  
Cenex/Land O' Lakes  
P.O. Box 64089  
St. Paul, MN 55164-0089

Dear Mr. Currie:

Subject: Revised Labeling  
Class MCPA  
EPA Registration No. 1381-104  
Your Submission Dated May 12, 1992

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

- 1) The Statements of Practical Treatment should be removed and placed under the separate heading "Statement of Practical Treatment." Each statement should also be preceded by the appropriate sub-heading.
- 2) Rewrite the Environmental Hazard statement to read "Drift or run-off 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.
- 3) Rewrite the first sentence of the Pesticide Disposal statement to read "Pesticide wastes are acutely hazardous."

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above charges.

Sincerely yours,

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

Enclosure

CONCURRENCES							
SYMBOL	H7505C						
SURNAME	P. KENNY						
DATE	9/21/92						

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April 1992 - Amendment Submission

Front Panel

**CLASS**

**CROP PROTECTION**

**CLASS**

**MCPA**

**PHENOXY HERBICIDE**

**ACTIVE INGREDIENT:**

Dimethylamine Salt of 2-methyl-4-chlorophenoxyacetic acid\*.....48.72%

INERT INGREDIENTS: ..... 51.28%

TOTAL ..... 100.00%

\*Isomer Specific by AOAC Method No. 6.A18-22 (13th Edition)

\*Equivalent to 39.72% 2-methyl-4-chlorophenoxyacetic acid

Contains 3.70 lb. MCPA per gallon

**KEEP OUT OF REACH OF CHILDREN**

**DANGER**

**SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS**

<sup>R</sup>CLASS is a registered trademark of Cenex/Land O'Lakes Agronomy Company

EPA Reg. No. 1381-104

F-90

EPA Est. 407-IA-1S, 407-MN-1A

Superscript used corresponds to

letter in lot number

Manufactured For  
**CENEX/LAND O'LAKES AGRONOMY CO.**  
St. Paul, MN 55164

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22 SEP 1992

1381-104

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS****DANGER**

Corrosive, causes eye and skin damage. Do not get in eyes. Avoid contact with skin. Harmful if absorbed through skin. Wear goggles or face shield when handling. In case of contact, 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. Remove and wash contaminated clothing before reuse.

Harmful if swallowed. If swallowed, induce vomiting immediately by giving two glasses of water and sticking finger down throat. Never give anything by mouth to an unconscious person. Seek medical attention.

**ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic invertebrates. Drift or runoff adversely effect aquatic invertebrates and nontarget plants. Do not apply directly to water or wetlands (swamps, bogs, marshes, and potholes). 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 supplier. 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.

Wash spray equipment thoroughly with CLASS Protank Cleaner after using this product. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Use care to avoid spray contact or drift to susceptible plants such as beans and other legumes, cotton, flowers, grapes, ornamentals, vegetables, and other plants. Do not permit spray mist containing this product to drift onto them, since even very small quantities of the spray, which may not be visible can cause severe injury during both growing and dormant periods.

With ground equipment, spray keeping the spray boom as low as possible, applying 3 to 20 gallons or more of spray per acre; (unless otherwise specified) using flat fan or flood fan nozzle tips. DO NOT apply with nozzles that produce fine droplet sprays. For aerial application, apply using the volume of water indicated under each crop listing, at 20 pounds or less nozzle pressure using nozzles that produce a coarse spray pattern.

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

**DIRECTIONS FOR USE**

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

Mixers/loaders or applicators are required to use face shields or goggles.

**RE-ENTRY STATEMENT**

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons. Do not enter treated areas without protective clothing until sprays have dried.

Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in a secure area, in original container only. Do not store near feed or foodstuffs.

**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.

**CONTAINER DISPOSAL:** 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.

**USE PRECAUTIONS**

Avoid spray drift by making applications when conditions such as wind, air stability and temperature inversions are not a factor. The use of CLASS Precision Drift Control Agent at the proper rate will aid in the reduction of spray drift.

**SUSCEPTIBLE WEEDS:** Arrowhead lily, beggartick, bullrush, burdock, burhead, buttercup, cocklebur, curly indigo, Dragon Head Mint, field pepper grass, goatsbeard, hempnettle, hoary cress, honeysuckle, jimsonweed, ladythumb, lambsquarters, marsh elder, mustards (except blue), pigweed, plantain, pennycress, poison hemlock, prickly lettuce, puncturevine, ragweed, redstem, shepherdspurse, stinkweed, water hyssop, water plantain, whitebrush, wild juve, wild marigold, wild pet onion, wild radish, wild sage, witchweed, yellow rocket.

**LESS SUSCEPTIBLE WEEDS:** Canada thistle, dandelion, nutgrass, sedge, sunflower, wild carrot.

**MIXING INSTRUCTIONS: WATER-BASED SPRAY --** Fill the equipment half full of water, agitate while adding this product, then add rest of water.

**NITROGEN FERTILIZER --** The compatibility of this product must be tested with the fertilizer before its use in application equipment. This is done by means of a quart jar test as follows: The amount of this product to add to one pint of liquid nitrogen fertilizer is determined by using this table :

AMOUNT OF MCPA PER ACRE	GALLONS OF FERTILIZER PER ACRE				
	10	20	30	40	50
	TEASPOONS OF MCPA PER PINT OF FERTILIZER				
1/2 pint	2/3	1/2	1/3	1/4	1/8
1 pint	1-1/4	1	3/4	1/2	1/4
2 pints	2-1/2	2	1-1/2	1	1/2
4 pints	5	4	3	2	1

The amount in the table is based on gallons of finished spray per acre. Different spray volumes will require appropriate changes in the amount of this product added to one pint of fertilizer. Add the required amount of this product to one pint of fertilizer in a quart jar and shake to mix well. Let the mixture stand and examine it after 5 minutes and again after 30 minutes. The product is incompatible if it balls up, forms flakes, sludges, gels, oily films, layers, or other precipitates. If the precipitate can be suspended with agitation the combination can be used if the equipment has vigorous agitation throughout mixing and spraying operations.

In some cases, when incompatibility occurs, the addition of 1/4 teaspoon of a compatibility agent cleared for application to growing crops to the jar before adding this product may solve the problem (1/4 teaspoon is equal to 2 pints per 100 gallons of fertilizer). IF THIS DOES NOT WORK, DO NOT ATTEMPT THE ADDITION OF THIS PRODUCT TO THE FERTILIZER.

--Fertilizer mixing Sequence: If a compatibility agent is not required, add half the fertilizer to the tank, make a premix of 1 part this product and 4 parts water and add premix to tank with agitation ON. Then add balance of fertilizer. Apply at once with agitation ON. --If a compatibility agent is required add it to half full tank before premix addition. Then proceed as above. MAKE SURE TO FOLLOW ALL DIRECTIONS ON THIS AND THE FERTILIZER AND COMPATIBILITY AGENT LABELING.

**ALL GRAIN CROPS:** Do not forage or graze meat animals on treated areas within 7 days of slaughter.

**SPRING PLANTED** (Oats, Barley, Rye, & Wheat Not Underseeded to Legumes): Apply 1/2 to 1 pint per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre, when grain is in 3 to 5 leaf stage or up to early boot stage (Zadoks 13 to 40). Use 10 or more gallons under adverse growing conditions. Apply when weeds are small. Do not apply during boot to dough stage.

**FALL PLANTED** (Oats, Barley, Rye, & Wheat Not Underseeded to Legumes): Apply 1/2 to 1 pint per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre, in early spring when weeds are small and grain is fully tillered, but before boot stage (Zadoks 25 to 40). Use 10 or more gallons under adverse growing conditions.

**RESCUE TREATMENT** (For Perennial Broadleaf Weeds in Wheat): Treat in spring after grain is tillered and at least 8 to 10" tall. Apply 3 pints per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre, when weeds are approaching bud stage, but do not spray when grain is in boot to dough stage. Use 10 or more gallons under adverse growing conditions. This application can produce injury to wheat. Use good judgement in determining the severity of weed infestation against possibility of crop damage. When weeds are scattered, spot treatment will lessen damage.

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**ESTABLISHED ALFALFA and NEW SEEDLINGS or OLDER STANDS of RED CLOVER:** For control of yellow rocket, pennycress (fanweed), and other susceptible weeds. Apply 1/2 pint per acre. Apply the recommended amount in a minimum of 1 gallon of water per acre for aerial application. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre. Use 10 or more gallons under adverse growing conditions. Apply in late fall following frost or early spring when crop is dormant. The temperature at time of spraying should be above 40oF.

**CONSERVATION RESERVE PROGRAMS AND SET-ASIDE ACRES:** NOTE: Do not use on alfalfa, clover, other legumes or newly seeded areas. Apply 1 to 4 pints per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre, when weeds are small and growing. Use 10 or more gallons under adverse growing conditions. Use higher rate for whitetop, canada thistle, buttercup and other hard to control weeds. Spray perennials in early bud to full bloom and regrowth in fall. Spray other weeds in spring and fall. DO NOT spray legumes, if present, unless injury can be tolerated. For control of whitebrush apply 3 pints in 1 gallon of diesel oil and 6 to 10 gallons water per acre by aircraft. Apply in spring or fall when foliage is developed and growing. Spray during bloom but not after blossom shed. Retreatment may be necessary. NOTE: Add MCPA to water, then add oil with agitation. Agitate while spraying.

**FOR SET-ASIDE ACRES** - Once the Agricultural Stabilization & Conservation Service has released Set-Aside Acres for grazing, do not allow dairy animals or animals being finished for slaughter to forage or graze treated fields within 7 days after treatment.

**FOR CONSERVATION RESERVE PROGRAMS** - DO NOT harvest or graze at any time.

**RANGELAND AND ESTABLISHED PASTURES:** Apply 1 to 4 pints per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre, when weeds are small and growing. Use 10 or more gallons under adverse growing conditions. Use higher rate for whitetop, canada thistle, buttercup and other hard to control weeds. Spray perennials in early bud to full bloom and regrowth in fall. Spray other weeds in spring and fall. DO NOT spray legumes, if present, unless injury can be tolerated. For control of whitebrush on rangeland apply 3 pints in 1 gallon of diesel oil and 6 to 10 gallons water per acre by aircraft. Apply in spring or fall when foliage is developed and growing. Spray during bloom but not after blossom shed. Retreatment may be necessary. NOTE: Add MCPA to water, then add oil with agitation. Agitate while spraying.

**PERENNIAL BROADLEAF WEEDS IN FALLOW LAND** (For Canada thistle, Whitetop, Field bindweed, and Texas blueweed): Apply 6 pints in a minimum of 3 gallons of water per acre for aerial application, 10 gallons of water for ground application, when weeds are young. Continue treatment for 2 to 3 years for best results. DO NOT plant any crops for 3 months after treatment.

**NON-CROP SPRAYING** (For Canada thistle, Whitetop, Meadow buttercup and similar hard to control weeds): Use 1/4 pint in 3 to 4 gallons water for spot treatment or 6 pints in a minimum of 3 gallons of water per acre for aerial application, 30 to 100 gallons of water for ground application. Spray to wet weeds thoroughly when weeds are in bud to early bloom and again in fall. DO NOT forage or graze livestock on treated areas within seven days of treatment.

**GRASSES GROWN FOR SEED:** Apply 1 to 2 pints per acre. For aerial application, apply the recommended amount in a minimum of 1 gallon of water per acre. Use 3 or more gallons under adverse growing conditions. For ground application, apply the recommended amount in a minimum of 3 gallons of water per acre. Use 10 or more gallons under adverse growing conditions. Use higher rate for heavy weed stands. In established grasses, apply in spring before head comes into boot and on seedling grasses after tillering. NOTE: Repeat treatment may be needed. Legumes present may be injured or killed. Bent, Buffalo, Carpet, and St. Augustine grasses may be injured.

**FLAX:** Apply 1/2 pint in a minimum of 3 to 5 gallons per acre for aerial application, 8 to 10 gallons for ground application, when flax is 3 to 6" tall before buds begin to form. A rate of 3/4 to 1 pint may be needed to control wild buckwheat, smartweed and thistles to prevent seed head formation, but flax may be injured. DO NOT forage or graze meat animals on treated areas within seven days of slaughter.

**RICE:** For arrowhead, water plantain and redstem, apply 1/2 to 2-1/2 pint in a minimum of 3 to 5 gallons of water per acre for aerial application, 10 to 30 gallons of water per acre by other means. Use 2 to 3 pints where sedge, nutgrass and bullrush are present. Apply when rice is fully tillered and 6 to 8" above water no sooner than 35 days before or later than 65 days after seeding or when rice stem begins to elongate. DO NOT apply when rice is in early seeding, boot, early heading or when the temperature is over 90oF. Consult your Area Extension personnel to determine tolerances of rice varieties to MCPA. DO NOT grow crayfish or catfish in treated rice fields.

**PEAS:** Use on peas to control susceptible weeds only where recommended by local agricultural Extension Service or Experiment Station specialists. Use 1/4 to 1/3 pint in a minimum of 10 gallons of water per acre for aerial application, 15 to 30 gallons of water for ground application, when peas are 3 to 7 inches tall, before first flowering and weeds are small. Higher rates of 1/2 to 3/4 pint per acre may be used to improve control of difficult weeds but crop injury is more likely to occur. Do not apply if peas are taller than 7 inches or when they are stressed for lack of soil moisture. Do not apply when air temperature is over 90oF. DO NOT feed forage or graze treated fields. DO NOT feed treated vines to livestock. NOTE: This product can cause injury and delayed maturity in the pea crop.

**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 Directions for Use label booklet ("Directions") when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OF MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein.

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 moisture 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 THE LIABILITY 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 OTHER 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.

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