

MAY 10 1995

Mr. Gene R. Currie
 Cenex/Land O'Lakes Agronomy Company
 P.O. Box 98
 Shenandoah, IA 51601-0098

Dear Mr. Currie:

SUBJECT: Label Amendment
Class MCPA Phenoxy Herbicide
EPA Registration No. 1381-104
Your Application Submitted April 24, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you make the following changes.

1. Add the following sentence at the beginning of the first paragraph under the heading "ENVIRONMENTAL HAZARDS":
 "Drift or run-off may adversely affect non-target plants."
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."
3. The subject product is not registered for use on corn. Accordingly, you must delete corn from the list of sites in the first sentence of the "NITROGEN FERTILIZER" directions.
4. The restrictions for small grains must be revised as on the previously accepted label to read as follows: "Do not forage or graze meat animals on treated areas within 7 days of slaughter."
5. The restrictions for conservation reserve programs must be revised as on the previously accepted label to read as follows: "Do not harvest or graze at any time."
6. The restrictions for flax must be revised as on the previously accepted label to read as follows: "Do not forage or graze meat animals on treated areas within 7 days of slaughter."

RD:STANTON:PM Team 23:Rm. 235:305-5218:Disk #1:S485998.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	May 8, 1995							

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A stamped copy of the label is enclosed for your records. Please submit (one) 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

R
CLASS
CROP PROTECTION

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAY 10 1995

CLASS
MCPA
PHENOXY HERBICIDE

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1381-104

.....	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 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 someone to explain it to you in detail.)

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

R Class is a registered trademark of Cenex/Land O'Lakes Agronomy Company

EPA Reg. No. 1381-104 ?-95
EPA Est. 407-IA-1S, 2H, 407-MN-1A
Superscript used corresponds to letter in lot number

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

NET CONTENTS _____

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Corrosive, causes eye and skin damage. Do not get in eyes. Harmful if swallowed. Avoid contact with skin. Harmful if absorbed through skin. Wear eye protection when handling.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Flush eyes with plenty of water for at least 15 minutes, call a physician.
IF ON SKIN: Flush with water. Get medical attention if skin irritation persists. Remove and wash contaminated clothing before reuse.
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.

Personal Protective Equipment:

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Waterproof gloves.
- 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. After each day of use, clothing or PPE must not be reused until it has been cleaned.

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 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

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 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.

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.

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.

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 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.
- Waterproof gloves.
- Shoes plus socks.
- Protective eyewear.

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 acutely hazardous. 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.

ANNUAL AND BIENNIAL WEEDS

Beggartick, bull thistle, burdock (common), burhead, cocklebur, * goatsbeard, * hempnettle, * jimsonweed, * kochia, * ladythumb, lambsquarter, * marshelder, mustards (except blue), pennycress (fanweed), pepperweed (field), pigweed (tumble, prostrate, smooth), poison hemlock, prickly lettuce, * puncturevine, ragweed (common, giant), redstem, * shepherdspurse, sicklepod, stinkweed, * sunflower, * velvetleaf, venice mallow, * wild carrot, wild radish, witchweed.

PERENNIAL WEEDS

Arrowhead, * bulrush, * bindweed (hedge, field), buttercup (corn, creeping, hairy), * Canada thistle, curly indigo, dandelion, dragonhead mint, ** hempnettle, * hoary cress (whiteweed), * honey suckle, plantain, * rush (soft), * smartweed, ** Texas blueweed, water plantain, ** whitebrush, ** wild garlic, * wild sage (Sonoma), ** wild onion, * Yellow Rocket.

- * 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 nozzle 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.

NITROGEN FERTILIZER: Weed and feed applications for corn, small grains, grasses grown for seed or grass pastures according to label use rates. -Add half the fertilizer to the tank, then add 1/2 to 3/4 pint of **CLASS (R) MCPA** per acre. Agitate constantly and vigorously and finish filling spray tank with fertilizer. Apply as soon as possible, agitating constantly. Do not hold spray mixture overnight. If incompatibility is a problem, the use of **CLASS (R) COMPLETE COMPATABILITY TM** agent at the recommended label rate may correct the problem. Fertilize according to recommendations of **Agri-Source TM** labs, your supplier, or your Extension specialist.

Herbicide foliage contact burning may occur as a result of fertilizer use. Lower use rates and concentrations will reduce this problem.

Wash spray equipment thoroughly with **CLASS R Protank TM** 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.

SPRING PLANTED SMALL GRAINS

Oats, Barley, Rye, and Wheat Not Underseeded With Legumes

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Annual weeds	1/2 pint	Apply when weeds are small.
Annual and biennial weeds	1 to 2 pints*	Apply to grain at 3 to 5 leaf stage or up to early boot stage (Zadocks 13 to 40). Do not apply during boot to dough stage. (Zadocks 40 to 83).
Perennial weeds	1-1/2 to 2 pints*	

FALL PLANTED SMALL GRAINS

Oats, Barley, Rye and Wheat Not Underseeded With Legumes

Annual and biennial broadleaf weeds	1/2 pint	Apply in early spring when weeds are small and grain is fully tillered, but before hoot stage (Zadocks 25 to 40).
Perennial weeds	1/2 to 1 pint*	

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**RESCUE TREATMENT
Wheat**

Perennial broadleaf weeds	3 pints**	Treat in spring after grain is tillered and at least 8 to 10 " tall and when weeds are approaching bud stage, but do not spray when grain is in boot to dough stage (Zadocks 40 to 83).
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*: The higher rate may cause grain injury.
 **: The 3 pint rate can produce injury to wheat. Use good judgement to determine the severity of weed problem against the possibility of crop damage. When weeds are scattered, spot treatment will lessen damage.

RESTRICTIONS AND LIMITATIONS FOR SMALL GRAINS

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

ESTABLISHED ALFALFA AND NEW SEEDLING OR OLDER STANDS OF RED CLOVER

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Yellow rocket, pennycress(fanweed) and other weeds	1 pint	Apply in late fall following frost or early spring when crop is dormant. The temperature at time of spraying should be above 40 degrees F.

RESTRICTIONS AND LIMITATIONS FOR

ESTABLISHED ALFALFA AND NEW SEEDLINGS OR OLDER STANDS OF RED CLOVER
 Do not forage or graze treated areas for 7 days after treatment

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

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Annual , biennial and perennial weeds	1 to 4 pints*	Apply when weeds are small and growing. Spray in spring and fall. Spray perennials in early bud to full bloom and regrowth in fall. Use higher rate for hoarycress (whitetop), Canada thistle, buttercup and other hard to control weeds.
Whitebrush	3 pints*	Apply in 1 gallon of diesel oil and 6 to 10 gallons of water per acre by aircraft. Apply in spring or fall when foliage is fully developed and growing. Spray during bloom, but not after blossom shed. Retreatment may be necessary. NOTE: Add CLASS (R) MCPA to water, then add the oil while agitating. Continue to agitate while spraying.

* Do not spray legumes, if present, unless injury can be tolerated.

RESTRICTIONS AND LIMITATIONS FOR
PASTURES, RANGELAND, CONSERVATION RESERVE PROGRAMS AND SET-ASIDE ACRES
Do not forage or graze treated areas for 7 days after treatment.

FALLOW LAND AND CROP STUBBLE

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Canada thistle, hoary cress (white-top) field bindweed and Texas blueweed	6 pints	Apply when weeds are young and continue treatment for 2 to 3 years for the best results. DO NOT plant any crops for 3 months after treatment.

NON-CROP AREAS

Airfields--Drainage Ditches--Fencerows--Roadsides--Railroad, Highway and Utility Rights-of-Ways and Other Non-Crop Areas

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Canada thistle, meadow buttercup, hoary cress (white-top) and other hard-to-control weeds	6 pints	Apply in a minimum of 2 gallons of water per acre for areial application, 20 to 100 gallons of water for ground application. Spray the weeds thoroughly when they are in bud to early bloom and again in the fall.
Spot treatment	1/4 pint	Apply in 3 to 4 gallons of water.

RESTRICTIONS AND LIMITATIONS FOR NON-CROP AREAS

Do not forage or graze treated areas for 7 days after treatment

GRASSES GROWN FOR SEED

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Annual, biennial and perennal weeds	1 to 2 pints*	Apply to established grasses before the head comes into boot. Apply to seedling grasses after tillering. Use the higher rate for heavier weed stands.

* Legumes present may be injured or killed. Bent, Buffalo, Carpet and St. Augustine grasses may be injured. NOTE: Re-treatment may be needed.

RESTRICTIONS AND LIMITATIONS FOR SEED GRASSES

Do Not forage or graze treated areas for 7 days after treatment.

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Annual and biennial broadleaf weeds	1/2 pint	Apply when weeds are small.
Smartweed and thistles to prevent seed head formation	3/4 to 1 pint*	Apply in a minimum of 3 gallons per acre for aerial application, 8 to 10 gallons for ground application, when flax is 3 to 6 inches tall before buds begin to form.

* Flax may be injured at this higher rate.

RESTRICTIONS AND LIMITATIONS FOR FLAX

DO NOT forage or graze treated areas for 7 days after treatment.

RICE

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Arrowhead, redstem, and water plantain	1/2 to 2-1/2 pints	Apply in a minimum of 3 gallons water per acre for aerial application, and 10 gallons of water per acre by other means.
Sedges, nutgrass, and bulrushes	2 to 3 pints	Apply when rice is fully tillered and 6 to 8 " above water no sooner than 35 days before or no later than 65 days after seeding or when rice stem begins to elongate. DO NOT apply when rice is in early seedling, boot, early heading or when temperature is above 90 degrees

Consult your Area Extension personnel to determine tolerances of rice varieties to MCPA. DO NOT grow crayfish or catfish in treated rice fields.

PEAS

WEEDS	AMOUNT OF CLASS (R) MCPA PER ACRE	DIRECTIONS
Annual and biennial weeds	1/4 to 1/2 pint	Apply in a minimum of 5 gallons of water per acre by aerial application, 15 gallons by ground application, when peas are 3 to 7 " tall, before first flowering and when weeds are small.
Perennial weeds	1/2 to 3/4 pint	This higher rate may be used to improve control of difficult weeds, but crop damage 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 90 degrees F.

RESTRICTION AND LIMITATION FOR RICE

CLASS (R) MCPA can cause injury and delayed maturity when applied to peas. Use only where and when recommended by Extension Service or crop specialist DO NOT graze or forage treated fields or feed treated vines to livestock.

LIMIT OF WARRANTY AND LIABILITY

This company warrants that this product conforms to the chemical description on the label and is reasonably fit for 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 OR 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 the Company, including, but not limited to, incompatibility with product 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.