

PM 23

1386-43

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File



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

24 1994

Nik Ramswick
UNIVERSAL COOPERATIVES INC.
P. O. Box 460 - 7801 Metro Parkway
Minneapolis, MN 55440

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 07/19/93 in Response to PR Notice 93-7
EPA Reg. No. 1386-43
2,4-D AMINE WEED KILLER

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/Candia Ink on paper that
contains at least 50% recycled fiber

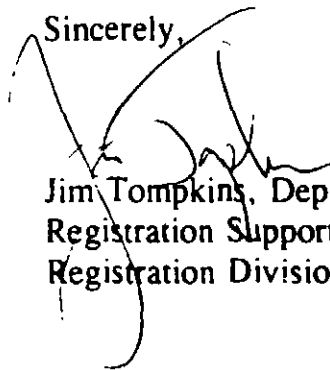
Submit the final printed labeling via the U.S. Postal Service to:

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division

Nik Ramswick
UNIVERSAL COOPERATIVES INC
P.O. BOX 460 7801 METRO PARKWAY
MINNEAPOLIS MN 55440

Comment for: EPA Reg Nr.1386-43
2,4-D AMINE WEED KILLER

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

EPA has determined that a "closed" mechanical transfer system is not required for 2,4-D products. In the personal protective equipment section of your amended labeling, you may revise the statement to read as follows:

CONTAINERS 5 GALLONS OR MORE: "A 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. If the mechanical system is 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."

Add the following sentence to the paragraph on laundering PPE: "After each day of use, clothing or PPE must not be reused until it has been cleaned." Please refer to the special 2,4-D guidance issued by EPA on September 13, 1993 (page 4) for placement of the sentence.

Please conform with the special 2,4-D guidance issued by EPA on September 13, 1993 for adding WPS statements.

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

Add the following User Safety Recommendation to the label in the location shown in Section A on Part 1 of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing."

UNIVERSAL COOPERATIVES INC
EPA Reg. Number: 1386-43
2,4-D AMINE WEED KILLER
Application date: 07/19/93
Original Submission

Add the following User Safety Recommendation to the label in the location shown in Section A on Part I of the Product Worksheet in Supplement Three-A to PR Notice 93-7: "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."

The glove requirement for "applicators and other handlers" in the "Personal Protective Equipment" section on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Waterproof gloves". 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.

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

The glove requirement for early entry in the Agricultural Use Requirements box on your proposed labeling is missing or incorrect. Remove the incorrect requirement (if any) and add "Waterproof gloves". The exact location is shown in Sections F and G on Part 2 of the Product Worksheet in Supplement Three-A to PR Notice 93-7.

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.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

2,4-D Amine Weed Killer

KEEP OUT OF REACH OF CHILDREN
CAUTION
See Side Panel For Additional Precautionary Statements

ACTIVE INGREDIENT:	
Dimethylamine salt of 2,4-dichlorophenoxyacetic acid*	47.2%
INERT INGREDIENTS	52.8%
Total	100.0%

*Equivalent to 39.2% 2,4-dichlorophenoxyacetic acid. Contains 3.8 pounds 2,4-D Acid equivalent per gallon. *Isomer specific by AOAC Method No. 6.D01-5.

Net Contents: 2 1/2 Gallons

EPA Reg. No. 1386-43
EPA Est. No. 1386-OH-1



UNIVERSAL COOPERATIVES, INC., MINNEAPOLIS, MN 55440

ACCEPTED
with COMMENTS
In EPA Letter Dated

BEST AVAILABLE COPY

MAR 24 1991
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1386-43

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

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and Other Handlers Must Wear:

- *Long-sleeved shirt and long pants
- *Chemical-resistant gloves
- *Shoes plus socks
- *Protective eyewear
- *Chemical-resistant apron when cleaning equipment, mixing, or loading

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.

Engineering Controls Statements: 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: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Contact a physician immediately. Give victim one or two glasses of water and induce vomiting by touching the back of throat with a finger. Repeat until vomit fluid is clear. Do not induce vomiting or give anything by mouth to an unconscious person.
If on Skin: Remove contaminated clothing and wash affected areas with soap and water. Do not reuse contaminated clothing until washed. Get medical attention if irritation persists.
If in Eyes: Flush with water for at least 15 minutes. Call a physician immediately.
If Inhaled: Remove victim to fresh air. Apply respiration if indicated.
For Medical Emergency Information call 1-800-228-5835, extension 138.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. F-W or runoff may adversely affect aquatic invertebrates and 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 apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters. Do not contaminate water intended for irrigation or domestic purposes (except as specifically recommended on this label) especially in areas where grapes, cotton, tomatoes, or other susceptible plants are grown. Do not treat irrigation ditches in areas where water will be used to overhead (sprinkler) irrigate susceptible crops especially grapes, tomatoes, tobacco, and cotton. Do not apply when weather conditions favor drift from target area.

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.

DIRECTIONS FOR USE

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

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 only apply to uses of this product that are covered by the Worker Protection Standard.

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.

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
- *Shoes plus socks
- *Protective eyewear

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 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. Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. Read the above reentry statement and the precautionary statements to workers. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: "CAUTION: Area treated with 2,4-D Amine Weed Killer (contains 2,4-D) on (date of application). Do not enter without appropriate protective clothing until sprays have dried. (Insert here Statement of Practical Treatment from label)."

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RECOMMENDED RATES OF 2,4-D AMINE WEED KILLER — CONTINUED

Crop (See Detailed Instructions Above)	Dosage Per Acre**	
	Normal Rates (Usually Safe To Crop)	Higher Rates for Special Situations* (More Likely To Injure Crop)
SORGHUM Postemergence 6 to 8 inches tall 8 to 15 inches tall (use only directed spray)	2/3 to 1 Pint 1 Pint	1 1/2 to 2 Pints
RICE	1 to 2 1/2 Pints	2 to 3 Pints
SUGARCANE	2 to 4 Pints	

*The higher rates as recommended above may be necessary to control difficult weed problems such as under dry conditions in the Western states. They should not be used, however, unless possible crop injury is acceptable. Consult State Agricultural Experiment Station or Extension Service weed specialists for recommendations or suggestions to fit local conditions.

**If band treatment is used, base the dosage rate on the actual area sprayed.

LAWN AND ORNAMENTAL TURF: Use 1 to 3 pints of 2,4-D Amine Weed Killer in enough water to give good coverage to one acre on established stands of perennial grasses. Do not use on creeping grasses such as Bent except for spot spraying. Newly seeded turf should not be treated until after the second mowing and the lower dosage rate should be used. Reseeding of lawns should be delayed following treatment. With spring application, reseed in the fall; with fall application, reseed in the spring. Legumes are usually damaged or killed, therefore, do not treat areas where the legumes are desired. Deep-rooted perennial weeds such as bindweed and Canada thistle may require repeated applications. The maximum number of broadcast applications per treatment site is 2 per year.

Resistant Weeds in Lawn and Ornamental Turf (Spot Treatment): To control certain broadleaf weeds, such as jimsonweed, prickly lettuce, mallow, purslane, shepherds-purse, smartweed, henbit, buttercup, wild carrot, docks, pokeweed, common mullein and sheep sorrel usually require a considerably higher dosage rate. These resistant weeds usually may be controlled in localized areas or spots by applying 1 to 1 1/4 tablespoons per gallon of water when the plants are young and growing vigorously.

THIS HIGH DOSAGE RATE CANNOT BE USED WITHOUT CAUSING SEVERE INJURY, AND CONSEQUENTLY, ITS USE MUST BE EXCLUSIVELY FOR SPOT TREATMENT WHERE SUCH INJURY CAN BE TOLERATED.

Repeated treatments, if new weed growth occurs, may be necessary to maintain control.

GRASS SEED CROPS: Use 1 to 4 pints per acre in spring or fall to control broadleaf weeds in grass being grown for seed. Do not apply from early boot to milk stage. Spray seedling grass only after the five-leaf stage, using 3/4 to 1 pint per acre to control small seedling weeds. After the grass is well established, higher rates of up to 4 pints can be used to control hard-to-kill annual or perennial weeds. For best results, apply when soil moisture is adequate for good growth. **NOTE:** Do not use on bent grass unless grass injury can be tolerated. Do not graze dairy animals nor cut forage for hay within 7 days after application.

FALLOW LAND: Use 1 to 2 quarts per acre on annual broadleaf weeds and up to 2 quarts per acre on established perennial species, such as Canada thistle and field bindweed. Apply to weeds actively growing. Do not plant any crop for 3 months after treatment or until 2,4-D has disappeared from the soil.

PASTURES AND RANGELAND: To control many broadleaf weeds in pastures, meadows, and rangelands, use 2 to 4 pints per acre of 2,4-D Amine Weed Killer in sufficient water to provide for uniform application. Treat when weeds are growing actively. Do not use on newly seeded areas until grass is well established. Do not use from early boot to milk stage where grass seed production is desired. Most legumes are usually injured or killed at the rates recommended. Do not graze dairy animals on treated areas within 7 days of application. Do not harvest grass for hay within 30 days of application. Do not graze meat animals on treated areas within 3 days of slaughter.

CONTROL OF SOUTHERN WILD ROSE: On rangelands, roadsides, and fence rows, use 2 quarts plus 4 to 8 fluid ounces of an agricultural surfactant per 100 gallons of water and spray thoroughly as soon as foliage is well developed. Two or more treatments may be required. On rangeland, apply a maximum of 2 quarts per acre per application. Do not graze dairy animals on treated area within 7 days after application.

GENERAL WEED CONTROL (airfields, roadsides, vacant lots, drainage ditch banks, fence rows, industrial sites, and similar areas): Use 1 to 2 quarts per acre. Usually 2 quarts per acre will give adequate control. Treat when weeds are young and actively growing. Do not use on herbaceous ground covers or creeping grass such as Bent. Legumes will usually be damaged or killed. Deep-rooted perennials may require repeat applications. Do not use on freshly seeded turf until grass is well established. Delay reseeding for 3 months or until 2,4-D has disappeared from soil. The maximum number of broadcast applications per treatment site is 2 per year.

WOODY PLANT CONTROL: To control woody plants susceptible to 2,4-D, such as Alder, Buckthorn, Elderberry, Sumac, and Willow on non-crop areas, use 2 quarts in 100 gallons of water. Wet all parts of the plants thoroughly, including stem and foliage to the point of runoff. Higher volumes of up to 400 gallons are necessary where the brush is very dense and over 6 to 8 feet high. Applications are more effective when made on actively growing plants. Treatment should not be made during time of severe drought or in early fall when leaves lose their green color. Hard to control species may require retreatment next season.

TREE INJECTION: For control of unwanted hardwoods such as elm, oak, hickory, and sweetgum in forest and other non-crop areas, apply undiluted by injecting 1 ml through the bark, using one injection per inch of trunk diameter measured at breast height (4 1/2 feet). For harder to control species (ash, maple, dogwood), use 2 ml undiluted per injection. All injections should be as near the root collar as possible and should be evenly spaced around the trunk. Injections may be made at any time of the year but are most effective during the growing season. Maples should not be treated during the spring sap rise.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Do not store at temperatures below 40° F. Do not store near fertilizers, seeds, insecticides, or fungicides.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Proper disposal of excess pesticide, spray mixture, or residue 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: 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.

WARRANTY AND LIMITATION OF DAMAGES

Seller warrants that this material conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use and Bayer assumes the risk of any use contrary to such directions. Seller makes no other express or implied warranty, including any other express or implied warranty of fitness or of merchantability, and no agent of Seller is authorized to do so except in writing with a specific reference to this warranty. In no event shall Seller's liability for any breach of warranty exceed the purchase price of the material as to which a claim is made.

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