

PM23

1386-587

File 1 of 8



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

MAR 23 1994

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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

Subject: Label Amendment Submission of 08/14/93 in Response to PR Notice 93-7
EPA Reg. No. 1386-587
UNICO MCPA 4 AMINE WEEK 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 SoyCandis Ink on paper that
contains at least 50% recycled fiber

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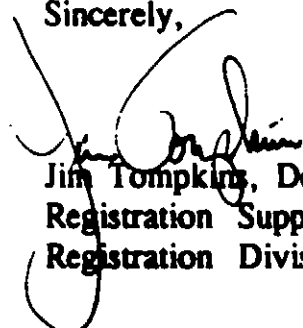
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20450-0001

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.1386-587
UNICO MCPA 4 AMINE WEED KILLER

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

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

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 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.

The circled and asterisked statement(s) in the Non-Agricultural Use Requirements box does not belong. Delete the sentence(s) from the Non-Agricultural Use Requirements box and place it where it appeared in your original labeling. If there are no remaining requirements in the box after you delete the sentence(s), delete the entire Non-Agricultural Use Requirements box.

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ACCEPTED
with COMMENTS
in EPA Letter Dated

MCPA 4 Amine Weed Killer

MAR 23 1991
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
1386-587

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 this label, find someone to explain it to you
in detail.)
See Remainder Of Precautionary Statements On Back Panel

ACTIVE INGREDIENT:

Dimethylamine salt of 2-methyl-4-Chlorophenoxy acetic acid*	52.2%
INERT INGREDIENTS	47.8%
Total	100.0%

*Equivalent to 2-Methyl-4-Chlorophenoxyacetic Acid 42.6%. *Equiva-
lent to 4 pounds of 2-methyl-4-Chlorophenoxyacetic acid per gallon.

Net Contents: 1 Gallon

EPA Reg. No. 1386-587
EPA Est. No. 1386-OH-1



UNIVERSAL COOPERATIVES, INC., MINNEAPOLIS, MN 55440

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER

Harmful if swallowed. Corrosive, causes eye damage. Do not get in eyes. Avoid contact with skin and clothing. Avoid inhalation of spray mist.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- *Coveralls over long-sleeved shirt and long pants
- *Chemical-resistant gloves
- *Chemical-resistant footwear plus socks
- *Protective eyewear
- *Chemical-resistant headgear for overhead exposure
- *Chemical-resistant apron when cleaning equipment, mixing, or loading

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/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.
- *Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

STATEMENT OF PRACTICAL TREATMENT

If on skin, wash affected areas with soap and water. If in eyes, flush with water and get immediate medical attention. If swallowed, drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, drink large quantities of water. Avoid alcohol. Get medical attention.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not apply when weather conditions favor drift from target areas. Avoid use of small-diameter spray nozzles.

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.

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 over long-sleeved shirt and long pants
- *Chemical-resistant gloves
- *Chemical-resistant footwear plus socks
- *Protective eyewear
- *Chemical-resistant headgear for overhead exposure

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 or dusts have settled. 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. 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: "DANGER. Area treated with MCPA 4 Amine Weed Killer on (date of application). Do not enter without appropriate protective clothing until sprays have dried. In case of accidental exposure, follow these procedures: (insert information found under Statement of Practical Treatment)."

MCPA 4 Amine Weed Killer is used to control broadleaf weeds in small grain crops, flax, established grasslands, and noncrop areas.

MCPA 4 Amine Weed Killer will control or kill the following weeds in addition to many other noxious plants susceptible to MCPA.

More susceptible weeds:

Arrowhead	Lambsquarter	Pepperweed (Field)	Shepherdspurse	Yellow Rocket
Cocklebur	Marshelder	Puncturevine	Stinkweed	Winter Cress
Goatsbeard	Mint (Dragonhead)	Redstem	Water Plantain	(And many other)
Koonya	Mustard	Ragweed	Wild Radish	Broadleaf Species)

Less susceptible weeds:

Buttercup	Hempnettle	Pigweed	Stinging Nettle	White Top
Canada Thistle	Hoary Cress	Purslane	Sunflower	
Dandelion	Plantain	Sow Thistle	Vetch	

GENERAL INFORMATION - To insure uniform results, shake container prior to opening and agitate prepared spray mixes thoroughly and continuously. Mix the recommended amount of product with enough water to obtain adequate spray coverage. For aerial application use 5 to 10 gallons and for surface application use approximately 30 gallons of water per acre to obtain sufficient coverage unless otherwise stated.

DO NOT MIX THIS PRODUCT WITH OIL.

Best results are obtained when spraying is done while weeds are young and actively growing.

Since local conditions affect the effectiveness and use of this product, consult your local agricultural extension or other qualified agronomists or weed control specialists for specific recommendations.

FIELD CROPS

FLAX - Use 1/4 to 1/2 pint of product per acre in enough water to obtain uniform and efficient coverage. Apply after the weeds have emerged where flax is 4 to 8 inches tall to first boot stage. DO NOT apply after bud formation. Higher dosages (3/4 pint per acre) may be required to control less susceptible weeds such as Canada Thistle. Flax may be injured at this higher rate. Do not forage or graze meat animals on treated areas within 7 days of slaughter.

SMALL GRAINS (Barley, Oats, Rye, and Wheat) - Use 1/2 to 1 pint of product per acre in enough water for adequate coverage. Apply spray mix during the 3 leaf to boot state for the selective control of susceptible weeds. To control less susceptible weeds, mix 3 pints of product per acre with sufficient water and spray between the tillering to early boot growth state. DO NOT apply to crops after the early boot stage.

Do not graze meat animals on treated areas until 7 days after treatment. Do not graze meat animals in treated areas within 7 days of slaughter.

PASTURES AND RANGE

GRASSES GROWN FOR SEED PRODUCTION - Use 1 to 2 pints of product per acre in enough water to give sufficient coverage. Use higher rate where weed competition is heavy. Spray seedling grasses after the tillering state and established grasses before the boot state during the spring.

ESTABLISHED GRASSLAND AND PASTURES - Use 1 to 3 pints of product per acre in enough water to provide adequate coverage. Use higher rate for control of less susceptible species, like Canada thistle, white top, and others. Spray perennials in early bud to full bloom state and during active regrowth in fall. Other weeds may be controlled during spring and fall. When clover and alfalfa are present, reduce rate to 1/2 pint of product per acre. Do not graze dairy animals on treated grass until 7 days after treatment. Do not graze meat animals in treated areas within 7 days of slaughter. Do not harvest grass for hay less than 21 days after application.

NOTE: If control is not satisfactory, repeat application. Legumes, including white clover, may be temporarily injured or killed. In some areas bent, buffalo, carpet, and St. Augustine grasses may be susceptible to injury.

NONCROP USES

NONCROP AREAS (Fencerows, Fallow Land, Rights-Of-Way, Roadsides, and Similar Areas) - Use 6 pints of product per acre in enough water to give sufficient coverage. For spot spraying, use 1/4 pint of product to 3 to 4 gallons of water. Wet target plants thoroughly during bud to full-bloom period (spring) and active growth (fall). DO NOT plant any crop until 3 months after treatment or until chemical has disappeared from soil. Do not forage or graze livestock on treated areas within 7 days of treatment.

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 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 Buyer 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.

CO-OP is a registered trademark of Universal Cooperatives, Inc.