UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

26 FEB 1993

Kelly Rahn NCH Corporation 2727 Chemsearch Blvd. Irving, TX 75062

Dear Ms. Hill:

Subject: Revised Confidential Statement of Formula Revised Product Labeling CHEMWEED-265 EPA Registration No. 1769-122 Your Submission Dated July 5, 1991

The Agency has reviewed your submission for a revised Confidential Statement of Formula, and the following comments apply:

1) The Confidential Statement of Formula (CSF) dated July 5, 1991 for the basic formulation is unacceptable. The registered product is formed by an integrated system whereby the free acid is reacted with potassium to form the potassium salt of MCPP. Therefore, the potassium salt of MCPP should be listed on the CSF with a nominal concentration that agrees with the label claim in accordance with PR Notice 91-2. The reactants should then be listed below to show the components of this reaction.

2) Please note that EPA Registration No. 464-583 has been transferred to EPA Registration No. 62719-63.

Please submit a new Confidential Statement of Formula, incorporating the changes indicated above.

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 heading "Active Ingredients" should be made singular.

2) Due to new EPA policy, part of the Environmental Hazards section has been changed. To comply, change the sentence "Do not apply to water or wetlands (swamps, bors, marshes and potholes)" to read "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."

CONCURRENCES						
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DATE	2/25/93					

EPA Form 1920-1A (1/90)

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Printed on Recycled Paper

OFFICIAL FILE COPY

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

Sincerely yours,

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

Enclosure

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EPA Form 1320-1A (1/90)

LEFT PANEL

NATIONAL CHEMSEARCH

CHEMWEED-265

Selective Weed Killer

ACTIVE INGREDIENTS:

Potassium Salt of 2-(2-methyl-4-chlorophenoxy)
propionic acid*
INERT INGREDIENTS:63.1*
TOTAL

PM23 1769-122

* Equivalent to 2 1/2 pounds 2-(2-methyl-4-chlorophenoxy) propionic acid per gallon or 30.68%.

CAUTION: KEEP OUT OF REACH OF CHILDREN

EPA Reg. No. 1769-122

(See side panel for additional precautions.)

NET CONTENTS:

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NATIONAL CHEMSEARCH Division of NCH Corporation 2727 Chemsearch Blvd. Irving, Texas 75062

CENTER PANEL

CHEMWEED-265 is especially formulated for killing clover, chickweed, plantain, mouse-ear chickweed, knotweed, ground ivy and certain other broad-leaf weeds on lawns, fairways and golf greens.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed. Do not breathe spray mist. Avoid contact with skin, eyes or clothing. Wear long pants, long-sleeved shirt, shoes and gloves when mixing, loading or applying this product. Wear face shield or goggles when mixing, loading or applying this product. In case of contact, immediately flusn eyes or skin with plenty of water. Get medical attention if irritation persists.

Do not reenter or permit workers to reenter treated areas until sprays have dried or dusts have settled.



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ENVIRONMENTAL HAZARDS

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This pesticide is toxic to wildlife. Do not apply directly to lakes, ponds or streams. Do not apply when weather conditions favor drift from areas treated. Apply this pesticide only as specified on the label.

Drift or run-off may adversely affect nontarget plants. Do not. apply directly to water or wetlands (swamps, bogs, marshes, and potholes). Do not contaminate water when disposing of equipment washwaters.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP 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.

When cleaning equipment, do not pour the washwaler on the ground; spray or drain over a large area away from wells and other water sources.

STATEMENT OF PRACTICA! TREATMENT

IF SWALLOWED: Call a physician or Poison Control Center immediately. If possible, vomiting should be induced under medical supervision. Drink one or two glasses of water and induce vomiting by touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

IF ON SKIN: Remove contaminated clothing and wash affected areas with soap and water.

IF IN EYES: Flush eyes with plenty of water. Call a physician immediately.



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RIGHT PANEL

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STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage or disposal.

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STORAGE: KEEP CONTAINER CLOSED.

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PESTICIDE DISPOSAL: Waste resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: 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.

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 through any type of irrigation system.

For established turf on lawns, golf greens and fairways, apply 1 1/2 fluid ounces of CHEMWEED-265 mixed with 2 gallons of water per 1000 square feet, or 1/2 gallon mixed with 30-40 gallons of water per acre.

For maximum results, the area should not be cut for 2-3 days before or after spraying. Do not sprinkle or water for 24 hours after application. Full visible effects require about 3 weeks.

NOTE: Do not spray flower beds, borders or shrubbery. Avoid allowing spray to drift over flowering plants and shrubs. Do not use first mowing as a mulch.

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TO REORDER: In Texas, call 1-800-442-7950 Outside Texas, call 1-800-527-9921

EPA Est. No. 4140

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