

January 20, 1993

Joanne I. Miller, Product Manager 23 U.S. Environmental Protection Agency Office of Pesticide Programs Registration Division (H7505C) 401 M St., S.W. Washington, D.C. 20460

Dear Ms. Miller:

This is a response in reference to the letter pertaining to the products which contain 2, 4-D. We are submitting two (2) copies of the appropriately revised labels for each of our products containing 2, 4-D. Each label is accompanied by a certification of compliance which has been requested.

"I, being an authorized representative of I. Schneid, Inc., certify that all containers of Knock Out EPA Reg. 2155-52 and D-Weed-O EPA Reg. 2155-51 produced by October 23, 1992 will bear revised labeling in accordance with the revised labeling required for the Task Force technical and manufacturing-use products. I further certify that all containers of said product sold or distributed by this company by April 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products."

If there are any questions concerning this information, please feel free to contact me at your convenience at (404) 351-4705.

Sincerely,

La A Hansen Lee R. Hanson

Director of Regulatory Affairs

enclosures

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

GENERAL WEED CONTROL: To control most weeds and grasses on non-cropland areas, such as railroad right-of-ways and industrial sites, for an extended time, apply 43.5 gallons per acre of undiluted weed killer after the most predominant weeds have emerged. No agitation is required.

NOTE: Users should consult State Agricultural Experiment Stations or Extension Service Weed Specialists for recommendations as to use of this weed killer in their particular area.

IMPORTANT: Do not apply directly to or otherwise permit this weed killer to contact susceptible plants as this may injure cotton, beans, peas, grapes, flowers, fruit trees, ornamentals or other desirable plants. Avoid spray drift to such susceptible plants (coarse sprays are less likely to drift). Vapors from this product may injure susceptible plants in the immediate vicinity. Thoroughly clean spray equipment with a suitable chemical cleaner before using for other purposes (or do not use same equipment for other purposes). Do not store neer fertilizers, seeds, insecticides or fungicides. Apply any time of year except when ground is frozen. Best results are obtained after predominant species are well established in late spring or early summer. Before treating, calibrate equipment to insure uniform coverage of the area to be treated. Me sure out the proper amount and apply. Coarse sprays are less likely to drift.

EQUIPMENT: This weed killer can be applied with railroad on-track, truck mounted or other standard spraying equipment. For treating small areas, tank-type hand sprayers or sprinkling can be used.

NOTICE OF WARRANTY: The munufacturer makes no warranties, expressed or implied, concerning the use of this product other than those indicated on the tabel. Purchaser assumes all risks of use and handling of this material when such use and handling are contrary to tabel instructions.

ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invenebrates. Drift or runoff may adversely affect 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. 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.

E.P.A. REG. NO. 2155-51-13256 E.P.A. EST. 2155-GA-1

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CONTROL NUMBER

NET CONTENTS 5 GALLONS

D-WEED-0

FORMULA NO. 4 NON-SELECTIVE WEED KILLER

CONTROLS WEEDS AND GRASSES BY CONTACT AND ROOT ACTION

2,4-Dichlorophenoxyacetic acid	
isooctyl ester *	
Bromacil (5-bromo-3-sec-butyl-	
6-methyluracil)	
INERT INGREDIENTS	

ACTIVE INGREDIENTS:

WARNING: KEEP OUT OF REACH CHILDREN

Harmful if swallowed or absorbed through skin. Causes skin irritation. See side panels for additional precautions.

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NOT FOR SALE TO OR USE BY HOMEOWNERS OR RESIDENTIAL USER

MANUFACTURED FOR:

SAN MAR LABORATORIES
P.O. BOX 93188-Martech Station
Atlanta, Georgia 30381

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NET CONTENTS 5 GALLONS

D-WEED-O

FORMULA NO. 4 NON-SELECTIVE WEED KILLER

CONTROLS WEEDS AND GRASSES BY CONTACT AND ROOT ACTION

ACTIVE INGREDIENTS:

2,4-Dichlorophenoxyacetic acid	
isooctyl ester *	
Bromacil (5-bromo-3-sec-butyl-	
6-methyluracil)	0.98%
INERT INGREDIENTS	
	Total 100.00%

*2,4-Dichlorophenoxyacetic acid equivalent0.70% FIRST! READ ENTIRE LABEL OBSERVE ALL WARNINGS AND FOLLOW DIRECTIONS CAREFULLY, USE ONLY IN CONFORMANCE WITH FEDERAL AND STATE REGULATIONS.

WARNING: KEEP OUT OF REACH CHILDREN

Harmful if swallowed or absorbed through skin. Causes skin irritation. See side panels for additional precautions.

NOT FOR SALE TO OR USE BY HOMEOWNERS OR RESIDENTIAL USERS

MANUFACTURED FOR:

SAN MAR LABORATORIES P.O. BOX 93188-Martech Station Atlanta, Georgia 30381

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed, absorbed through skin or inhaled. Causes skin irritation. When handling this product, wear chemical resistant gloves and face shield or goggles. Do not breathe spray mist. Do not get in eyes or on clothing. Wash thoroughly after handling. Avoid contamination of food and feed. Keep out of reach of domestic animals. Do not use on humans, household pets or livestock. Keep children and pets off treated areas until material is washed into the soil and grass is

For containers over 1 gation and less than 5 gallons in capacity: Persons engaged in open pouring of this product must also wear coveralls or a chemical

For containers of 5 gallions or more in capacity: Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron. 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.

Clothing Requirement Statements: When mixing, loading or applying this product croping requirements statements. When the product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators. applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

Personal Hygiene Statements: Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

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

IF SWALLOWED: Do not induce vomiting. Get medical attention. NOTE TO PHYSICIAN: Aspiration hazard may counterindicate the use of gastric

IF IN EYES: Flush with plenty of water. Get medical attention.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention, IF INHALED: Remove victim to fresh air. Apply artificial respiration if indicated.

- STORAGE AND DISPOSAL:

 1. PROHIBITION-DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE, DISPOSAL OR CLEANING OF EQUIPMENT. OPEN DUMPING
- 2. PESTICIDE DISPOSAL: Pesticide wastes are toxic, Improper disposal of excess pesticide, spray mixture, or rinsate 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, 3. CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and disposed of in a sanitary landfill, or by other procedures approved by state and local authorities.