

2217-362

11/05/2003

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Craig Martens
PBI Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101-0090

NOV - 5 2003

Dear Mr. Martens:

Subject: Revised Labeling
MCPA Amine 4 Herbicide
EPA Registration No. 2217-362 ✓
Your Submission Dated September 9, 2003

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- Move the Non-Agricultural Use Requirements box on page 6 to page 3 immediately below the Agricultural Use Requirements box.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391. A copy of the scientific review is enclosed for your assistance.

Sincerely yours,

JS

Joanne I. Miller
Product Manager (23)
Herbicide Branch
Registration Division (7505C)

Enclosure



MCPA AMINE 4

A Postemergent Herbicide for the Control of Broadleaf Weeds in Flax, Wheat, Oats, Barley, Rye, and Turf.

Controls Lambsquarters, Pigweed, Kochia, Mustards, Dandelion, Ragweed, Tartary Buckwheat, Cocklebur, and others.

ACTIVE INGREDIENT:	
Dimethylamine salt of 2-methyl-4-chlorophenoxyacetic acid.....	50.37%
INERT INGREDIENTS:	<u>49.63%</u>
TOTAL	100.00%

THIS PRODUCT CONTAINS:
4 lbs. 2-methyl-4-chlorophenoxyacetic acid equivalent per gallon or 41.1%.

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 additional Precautionary Statements and First Aid on side panel.

NET CONTENTS: 2 1/2 GALLONS

876/ AP-----
EPA REG NO 2217-362
EPA EST NO 2217-KS-1
MANUFACTURED BY:

G **pbi/gordon**
corporation
An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101
Telephone: 1-800-821-7925

ACCEPTED
with COMMENTS
in EPA Letter Dated
NOV - 5 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-362



READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards To Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes, or on clothing. Avoid contact with skin. Avoid breathing spray mist. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE):

Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks and 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/ maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Control 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:

Users should:

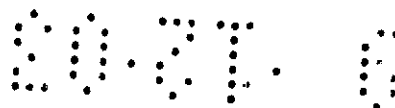
- ◆ Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.



ENVIRONMENTAL HAZARDS:

Drift or runoff may adversely affect 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 contaminate water when disposing of equipment washwater. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources. Do not apply when weather conditions favor drift from target area.

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.

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 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 enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

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, wear: coveralls, waterproof gloves, shoes plus socks, and protective eyewear.

STORAGE AND DISPOSAL

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

STORAGE: Store in original container in a locked storage area inaccessible to children or pets. Keep from freezing. To prevent cross-contamination, do not store near other herbicides, fertilizers, insecticides, fungicides, or near seeds.

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: *For 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. *For 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.

USE PRECAUTIONS:

Do not apply this product through any type of irrigation system. Don't overdose! Avoid spray drift to cotton, soybeans, tomatoes, tobacco, grapes, fruit trees, flowers, garden crops, ornamental plants, shrubs, trees and other hormone sensitive, desirable plants. Do not apply near these plants because small quantities of wind drifted herbicide may cause severe injury. Do not apply when wind speed is sufficient to cause drift.

Do not apply when an air temperature inversion exists. An air inversion may be detected by creating a smoke column and observing a layering effect.

Do not broadcast spray when air temperatures exceed 85°F; some injury may be expected with spot treatments when air temperatures exceed 85°F.

To aid in avoiding spray drift, use coarse sprays and low pressure. Do not use nozzles which produce fine spray droplets under high pressure. The use of thickening agents or anti-drift additives and drift reducing equipment is of value in preventing spray drift.

Care should be taken not to make applications where runoff could carry the chemical to nontarget areas. Local spray conditions will vary. Check local recommendations first.

GENERAL INFORMATION:

Efficacy tests in the U.S. and in Europe show that several crops such as flax and small grains underseeded with legumes are more tolerant of MCPA than they are of 2,4-D. This product is effective on a large number of broadleaf weeds and is useful for controlling these weeds in certain crops. Use Gordon's MCPA Amine 4 on oats because oats are more tolerant to this herbicide than they are of 2,4-D.

WHEN TO USE:

Best results are obtained from Gordon's MCPA Amine 4 when used on weeds that are young and in an actively growing condition. Applications of lower rates to susceptible annual weeds usually will be satisfactory, but for the perennial weeds and other conditions where weed kill is difficult, use higher rates. When used as a selective spray in crops, the stage of growth of the crop must be considered. Some weeds are hard to kill and repeat applications may be necessary.

SPRAY PREPARATION:

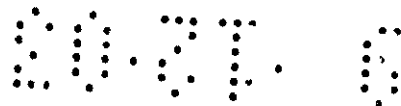
Fill spray tank with one-half the required amount of water, then add the recommended amount of Gordon's MCPA Amine 4 and continue filling spray tank with the balance of water. Keep agitator running when filling the spray tank and during spray operations. Use enough spray volume for uniform coverage by ground or air application. The amount of water required for low volume applications may vary from 5 to 25 gallons per acre. For high volume applications 25 to 100 gallons or more of water will be necessary for good coverage. In any case, use the same amount of Gordon's MCPA Amine 4 recommended per acre.

To convert local recommendations into forms of Gordon's MCPA Amine 4, use the following table.

MCPA Acid	1 1/4 lb.	1 lb.	3/4 lb.	1/2 lb.	3/8 lb.	1/4 lb.
MCPA Amine 4	2 1/2 pints	2 pints	1 1/2 pints	1 pint	3/4 pint	1/2 pint

CONTROLS		
Canada thistle	Lambsquarters	Redroot pigweed
Cocklebur	Mustards	Shepherdspurse
Corn spurry	Pepperweed	Sow thistle
Dandelion	Puncturevine	Stinkweed
Hempnettle	Purslane	Sunflower
Hoary cress	Ragweed	Tartary buckwheat
Kochia		

Crop	Amount MCPA Amine 4 Per Acre	Instructions
Flax	$\frac{1}{3}$ to $\frac{3}{8}$ Pint	Use at this rate when susceptible weeds such as mustard are the main problem.
	$\frac{1}{2}$ Pint	Use at this rate when weeds such as pigweed, lambsquarters, stinkweed, ragweed, cocklebur are the problem. Do not forage or graze livestock on treated areas within 7 days of treatment.
Small Grains: (Wheat, Oats, Barley, Rye)	$\frac{1}{2}$ Pint Spring planted (not underseeded to legumes)	Do not forage or graze livestock on treated areas within 7 days of treatment. Treat in spring when small grains are fully tillered and 8 to 10 inches tall. Do not spray crop in the boot to dough stage. Use about 8 gallons of water per acre.
	$\frac{1}{2}$ Pint Fall planted	Apply in spring when annual broadleaf weeds are small and crop is fully tillered but before crop jointing. Use about 8 gallons of water per acre.
	3 Pints Emergency treatment for perennial broadleaf weeds in wheat.	Treat in spring after grain is tillered and at least 8 to 10 inches tall. Apply when weeds are approaching bud stage, but do not spray crop in the boot or dough stage. The 3 pint (1.5 lb. acid equivalent) per acre application of any MCPA product can produce injury to wheat. Balance the severity of your weed problem against the possibility of crop damage and make the proper judgment. Where perennial weeds are scattered, spot treatment is suggested to minimize the effect of crop injury.
Small Grains: Underseeded with mixed legumes: alfalfa, clovers (alsike, red and ladino), and trefoil.	$\frac{1}{2}$ Pint	Treat in early spring when crop is in the tiller to boot stage and 8 to 10 inches tall, and when legume seedlings are 2 to 3 inches tall. Do not spray when crop is in the boot to dough stage. Use 5 to 6 gallons of water per acre since higher volumes may result in injury to legumes.
Oats	$\frac{1}{2}$ to 1 Pint	Spray after oats are fully tillered (4 to 6 inches tall) but before they are in the boot to dough stage. Apply the lower rate where annual weeds are the major problem, the higher rate for perennial weeds. Use 8 to 10 gallons of water per acre.
Peas (For use in the Pacific Northwest only.)	$\frac{1}{2}$ to $\frac{3}{4}$ Pint	Treat when peas are 4 to 6 inches tall using 15 to 30 gallons of water per acre. Do not spray while peas are in blossom. Peas may show slight injury but they usually recover a few days after treatment. Use the higher rate before buds form on Canada thistle to prevent from going to seed. Do not feed treated vines to livestock. Do not forage or graze treated pea fields. Do not spray peas that are stressed from lack of moisture or when temperatures are over 90°F. For aerial application, apply in 10 gallons of water per acre.



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. Keep unprotected persons out of treated areas until sprays have dried.

LAWNS, GOLF COURSES AND SIMILAR TURF AREAS:

Not for use on turf being grown for sale or other commercial use as sod, or for commercial seed production, or for research purposes.

Best results are secured when treatment is made in fall or spring when weeds are actively growing. For best results on thistles, treat in the early bud stage. Do not apply to newly seeded lawns until grass has become well established.

NOTE: White clover is susceptible to injury. Also in some areas, bentgrass, carpetgrass and St. Augustinegrass are susceptible to injury.

Small Areas:

Use 3 tablespoons of product in 3 to 5 gallons of water and apply evenly over 1,000 square feet.

Large Areas:

Use 1 to 4 pints of product per acre in 10 to 100 gallons of water to give thorough coverage.

ESTABLISHED PERENNIAL GRASSES IN PASTURES, RANGELANDS, AND FARMSTEADS (FENCEROWS, FARMYARDS, AND SHELTERBELTS):

Gordon's MCPA Amine 4 may be applied postemergence to established grasses grown in pastures, rangelands, and farmsteads (fencerows, farmyards, and shelterbelts). Broadcast applications and spot treatments are appropriate.

Gordon's MCPA Amine 4 is effective on a large number of broadleaf weeds including mustards, thistles, pigweed, ragweed, burdock, plantain, dandelion, cocklebur, shepherdspurse, stinkweed, purslane, and many others. Application schedules are presented as follows:

WEED TYPE	WHEN TO APPLY
Annual broadleaf	Spring or fall and during active growth.
Biennials	Spring or fall. Or, during the seedling to rosette stages of the weeds. Sequential treatments may be required.
Perennials	Spring or fall. Or, during the early bud to bloom stages and during fall regrowth. Sequential treatments may be required.

Treatments of Gordon's MCPA Amine 4 may injure or kill legumes including alfalfa, clovers, lespedezas, sweet clover, trefoils, and vetches. Do not use this product where legumes are present and desirable.

Established grass stands are defined as perennial grasses that have planted one or more seasons before the application of this product. Application rates are presented in Table 1.

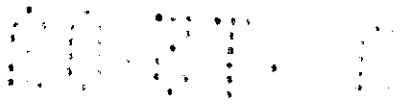


Table 1. Established grasses in pastures, rangelands, and farmsteads (fencerows, farmyards, and shelterbelts).

Weed Types	Broadcast Rates of Gordon's MCPA Amine 4 per Acre ¹		
	Amount of Gordon's MCPA Amine 4, Pints / Acre	Acid Equivalents, Pounds / Acre	Spray Volumes, ² Gallons / Acre
Annual Broadleaf:	¾ - 1	0.38 - 0.50	5 - 25
Biennial and Perennial Broadleaves:	2 - 4	1.0 - 2.0	5 - 25

¹ Use the lower rate within the range specified for sensitive weeds. Use the higher rate within the range specified for tall vegetation, dense canopies, difficult to control weeds, weeds beyond the suggested growth stages, or during adverse conditions.

² Use the higher spray volumes for tall vegetation and dense canopies.

SPOT TREATMENTS OF GORDON'S MCPA AMINE 4:

Mix ¼ pint (4 fl.oz.) of Gordon's MCPA Amine 4 in 3 gallons of water to control perennial weeds such as Canada thistle. Apply during active weed growth and prior to bloom. If needed, spray the regrowth.

TANK MIXTURES WITH BANVEL® HERBICIDE AND VANQUISH® HERBICIDE:

This product can be mixed with Banvel® Herbicide (EPA Reg. No. 55974-1), the dimethylamine salt of dicamba. Banvel® Herbicide contains 3,6-dichloro-o-anisic acid (40.0%) or 4.0 pounds per gallon. Also, this product can be mixed with Vanquish® Herbicide (EPA Reg. No. 55947-46), the diglycolamine salt of dicamba. Vanquish® Herbicide contains 3,6-dichloro-o-anisic acid (38.5% or 4.0 pounds per gallon. These tank mixtures are recommended for use on pastures, rangelands, and farmstead areas (fencerows, farmsteads, and shelterbelts) in accordance with the most restrictive of label limitations and precautions. No label dosage rates can be exceeded. This product cannot be mixed with any product containing a label prohibition against such mixing. Tank mixture recommendations are for use only in states where the tank mix product and the application site are registered.

Application rates are presented in Table 2.

Table 2. Established grasses in pastures, rangelands, and farmstead areas (fencerows, farmyards, and shelterbelts).

Weed Types	Broadcast Rates/Acre ¹		
	Amount of Product, Pints/Acre	Acid Equivalents, Pounds/Acre	Gallons/Acre
Annual Broadleaf:			
Gordon's MCPA Amine 4 plus	1 - 1½	0.5 - 0.75	3 - 25
Banvel® Herbicide or Vanquish®	¼ - ½	0.125 - 0.25	
Biennial and Perennial Broadleaves:			
Gordon's MCPA Amine 4 plus	1½ - 3	0.75 - 1.50	3 - 25
Banvel® Herbicide or Vanquish®	½ - 1	0.25 - 0.50	

¹ Use the lower rates within the ranges specified for sensitive weeds. Use the higher rates within the ranges specified for tall vegetation, dense canopies, difficult to control weeds, weeds beyond the suggested growth stages, or adverse conditions.

² Use the higher spray volumes for tall vegetation and dense canopies.

PRECAUTIONS AND LIMITATIONS FOR THE TANK MIXTURES OF GORDON'S MCPA AMINE 4 PLUS BANVEL® HERBICIDE or GORDON'S MCPA AMINE 4 PLUS VANQUISH® HERBICIDE:

- ◆ Observe all precautions and restrictions on the labels used in this tank mixture.
- ◆ Animals cannot be removed from the treated area for slaughter prior to 30 days after the last application.
- ◆ There is no waiting period between treatment and grazing for nonlactating animals.
- ◆ Do not graze lactating dairy animals within 7 days of treatment. Treated grasses may be harvested for dry hay, but do not harvest within 37 days of treatment.
- ◆ Do not apply these tank mixtures adjacent to sensitive crops when the temperature on the day of application is expected to exceed 85°F as drift is more likely to occur.
- ◆ ~~Agriculturally approved drift-reducing additives may be used.~~

LIMITED WARRANTY AND DISCLAIMER.

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions, or to use of the product under abnormal conditions such as drought, excessive rainfall, tornadoes, hurricanes, etc. These factors are beyond the control of the manufacturer or the seller. Any damages arising from a breach of the manufacturer's warranty shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

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