

PM 23

2217-455
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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DEC 16 1996

James A. Armbruster, Ph.D.
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 14090
Kansas City, MO 64101-0090

Dear Dr. Armbruster:

Subject: Alternate Confidential Statement of Formula;
Revised Labeling (Revised Ingredient Statement)
2,4-Dichlorophenoxyacetic Acid
EPA Registration No. 2217-455
Your Submission Dated October 30, 1996

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

The Confidential Statement of Formula dated October 11, 1996 for the alternate formulation agrees with the label claim in compliance with PR Notice 91-2 and is acceptable.

The Confidential Statement of Formula has been added to your file as part of the record.

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 provision:

Revise the statements "Harmful if swallowed. Absorbed through the skin" in the Precautionary Statements to read "Harmful if swallowed or absorbed through the skin."

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above change, before releasing the product for shipment.

Sincerely yours,

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

Enclosure

DK: 305-7546:FHB/PM23

		CONCURRENCES						
SYMBOL ▶	7505C							
SURNAME ▶	D. KENNY							
DATE ▶	12/16/96							

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2,4-DICHLOROPHENOXYACETIC ACID

FOR USE IN THE MANUFACTURE OF HERBICIDES

- NOT FOR RESALE
ACCEPTED
with **COMMENTS**
In EPA Letter Dated

DEC 16 1996

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

2217-455

ACTIVE INGREDIENT:

2,4-dichlorophenoxyacetic acid	98.2%
INERT INGREDIENTS	<u>1.8%</u>
TOTAL	100.0%

*Isomer Specific by AOAC Method No. 6D 01-5.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Below for Precautionary Statements.

NET WEIGHT _____ POUNDS (_____ KILOS)

AP062695
 EPA REG. NO. 2217-455
 EPA EST. NO. 067781-BR-001
 Contract Manufactured for:
 PBI/GORDON CORPORATION
 KANSAS CITY, MISSOURI 64101

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

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

CAUTION: Irritating dust. Harmful if swallowed. Absorbed through the skin. Avoid inhalation of dust or contact with skin or eyes. In case of contact, flush with plenty of water and see that the eyes get medical attention.

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

Only For Formulation Into a Herbicide for (1) **AGRICULTURAL CROPS** (Corn, sorghum, rice, wheat, oats, barley, rye, grasses - annual, grasses - perennial, sugarcane, soybeans) **TERRESTRIAL NONFOOD CROPS** (Ornamental trees, shrubs and vines, lawn and turf grasses, uncultivated agricultural areas, uncultivated nonagricultural areas, general soil treatment, recreation areas, industrial sites, paved areas, outdoor areas) **AQUATIC SITES** (Agricultural irrigation water and ditches, agricultural drainage water and ditches, lakes, ponds and impounded water, streams, rivers and canals, swamps, marshes, wetlands, estuaries, tidal marshes, commercial and sport fish-bearing waters, industrial ponds) **FORESTRY SITES** (Forest trees, plantings, forest tree nurseries) (2) Uses for which US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration, and (3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

Formulators using this product are responsible for obtaining EPA registration of their formulated product.

MANUFACTURER TO FURNISH USER WITH COMPLETE DIRECTIONS FOR USE IN ACCORDANCE WITH HIS FORMULATIONS.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf (excluding sod farms) uses after June 15, 1994, must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below.

GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."
2. Containers of 5 gallons or more in capacity must also bear the following statement: "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."

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SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

1. FOR AGRICULTURAL USES

- a. **Clothing Requirement Statements:** "When mixing, loading or applying this product or repairing or cleaning equipment used with this 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."
- b. **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 days 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."
- c. The maximum application rate to pasture and rangeland is the lower of (1) existing application rate on currently registered label or (2) 2 pounds 2,4-D acid equivalent per acre per application per site.
- d. The maximum application rate to forestry site preparation is the lower of (1) existing application rate on currently registered label or (2) 4 pounds 2,4-D acid equivalent per acre per application per site.
- e. Reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

2. FOR INDUSTRIAL/AQUATIC USES

- a. **Clothing Requirement Statements:** "When mixing, loading or applying this product or repairing or cleaning equipment used with this 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."
- b. **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."

3. FOR RESIDENTIAL AND TURF USES

- a. Clothing Requirement Statements: (1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes." (2) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves. (3) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection. (4) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves. (5) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection. (6) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves. (7) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection.
- b. Personal Hygiene Statements: (1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water."; (2) For All Liquid Products: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."
- c. The maximum application rate to turf is the lower of (1) existing application rate on currently registered label or (2) 2 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.
- d. The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

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STORAGE & 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.

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.

CONTAINER DISPOSAL: Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or if allowed by State and local authorities by burning. If burned stay out of smoke.

IMPORTANT: Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals.

LIMITED WARRANTY. Manufacturer warrants that the chemical composition conforms to the ingredient statement given on the label and that this product is suited for the labeled use when applied according to label directions. Because of widely varying use conditions, it is impossible to eliminate all risks even when label directions are followed.

EXCLUSION OF OTHER WARRANTIES AND REMEDIES. Except where such disclaimers and exclusions are specifically prohibited by applicable law. THE FOREGOING IS THE ONLY GUARANTEE OR WARRANTY APPLICABLE TO THIS PRODUCT AND IS GIVEN EXPRESSLY AND IN LIEU OF ALL OTHER WARRANTIES EXPRESSED OR IMPLIED, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND ALL SUCH WARRANTIES WHICH EXCEED OR DIFFER FROM SAID LIMITED WARRANTY ARE DISCLAIMED BY MANUFACTURER, and, upon Manufacturer's compliance with said limited warranty. BUYER SHALL HAVE NO REMEDY AGAINST MANUFACTURER FOR ANY TYPE OF DAMAGE OR LOSS, and, IN NO EVENT SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL DAMAGE OR LOSS.

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