

2217-455

08/05/2013

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG 05 2013

James L. Kunstman
PBI/Gordon Corporation
P.O. Box 014090
Kansas City, MO 64101

SUBJECT: Alternate Confidential Statement of Formula Adding New Source, and Label
Amendment, Submission Dated 29-MAY-2013
2,4-Dichlorophenoxyacetic Acid
EPA Registration Number 2217-455
Decision #472388

Dear Dr. Kunstman:

The alternate CSF, dated 24-MAY-2013, is acceptable and will be added to Agency files.

The label amendment referred to above, submitted in accordance with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) copy of your final printed labeling before you release the product for shipment. This amended labeling supersedes all previously accepted labels for this product.

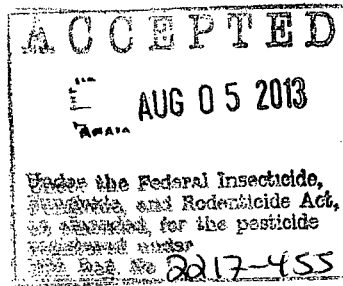
Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague".

Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

2,4-DICHLOROPHENOXYACETIC ACID

EPA Reg. No. 2217-455



FOR USE IN THE MANUFACTURE OF HERBICIDES
NOT FOR RESALE

ACTIVE INGREDIENT:

2,4-dichlorophenoxyacetic acid 98.2%

INERT INGREDIENTS: 1.8%

TOTAL 100.0%

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

KEEP OUT OF REACH OF CHILDREN

DANGER

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

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Do not get in eyes, or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if absorbed through skin, if swallowed, or if inhaled. Avoid contact with skin. Avoid breathing dust. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| 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 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 on skin or clothing: | <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 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. |
| <p>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.</p> | |
| <p>NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.</p> | |

Environmental Hazards

This chemical is toxic to fish and aquatic invertebrates. 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 Pollution 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 local 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 an herbicide for the following use(s):

1. AGRICULTURAL CROPS
 - a) Grain and seed crops: corn, sorghum (milo), soybeans (preplant), rice, small grains (wheat, oats, barley, rye), fallow cropland, crop stubble.
 - b) Crops grown exclusively for seed or planting: grass seed crops, sod production.
 - c) Sugar crop: sugarcane.
 - d) Forage crops: annual grasses, perennial grasses, rangeland (grasslands providing forage for grazing animals), pasture (grassland or grasses providing forage suitable for grazing livestock).
 - e) Small fruits: orchard floors (pome fruit, citrus fruit, stone fruit, filbert, and nut crops), strawberry, blueberries.
2. TERRESTRIAL NONFOOD CROP AND NONCROPLAND AREAS
 - a) Ornamental trees, shrubs and vines, lawn and turf grasses: yards, cemeteries, parks.
 - b) Uncultivated agricultural areas: fence rows, rights-of-way, barrier strips, established perennial grasses such as the Conservation Reserve Program.
 - c) Uncultivated nonagricultural areas: yards, lawn, turf, cemeteries, parks, airports, recreation areas (including golf courses), fairgrounds, roadsides, rights-of-way (highway, railroad, and utility), industrial sites, and paved areas.
3. AQUATIC WEED CONTROL.
 - a) Agricultural irrigation water and ditches, agricultural drainage water and ditches.
 - b) Lakes, ponds, reservoirs, impounded water, streams, rivers and canals, swamps, marshes, wetlands, estuaries, tidal marshes.
 - c) Commercial and sport fish-bearing waters.
 - d) Industrial ponds
4. FORESTRY.
 - a) Forest trees, plantings, forest tree nurseries.
 - b) Forest site preparation.
 - c) Forest roadsides, tree and brush control.
 - d) Established conifer release and tree injection treatments.
 - e) 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
 - f) Uses for experimental purposes that are in compliance with US EPA requirements.

- g) This product may be used to formulate products for specific use(s) not listed on the MUP label if the formulator, user group, or grower has complied with US 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.

STORAGE AND DISPOSAL

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

PESTICIDE 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. 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 HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into formulation equipment. Then offer for recycling if available or 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 AND DISCLAIMER

IMPORTANT: Read this LIMITED WARRANTY AND DISCLAIMER before buying or using this product. By opening and using this product, buyer and all users agree to accept the terms of this LIMITED WARRANTY AND DISCLAIMER in their entirety and without exception. If the terms are not acceptable, return this product unopened immediately to the point of purchase, and the purchase price will be refunded in full.

It is impossible to eliminate all risks inherently associated with use of this product. Damage to the treated article, ineffectiveness, or other unintended consequences can result from use of the product under abnormal conditions such as weather, presence of other materials, or the manner or use of application, etc. Such factors and conditions are beyond the control of the manufacturer, and **BY PURCHASING AND USING THIS PRODUCT THE BUYER AND ALL USERS OF THIS PRODUCT AGREE TO ACCEPT ALL SUCH RISKS.** Buyer and all users further agree to assume all risks of loss or damage from the use of the product in any manner that is not explicitly set forth in or that is inconsistent with label instructions, warnings and cautions.

The manufacturer warrants only that this product conforms to the chemical description given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use, subject to the inherent risks described below. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, 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 HEREBY EXPRESSLY DISCLAIMED.**

THE EXCLUSIVE REMEDY OF BUYER AND ALL USERS OF THIS PRODUCT, AND THE EXCLUSIVE LIABILITY OF THE MANUFACTURER, FOR ANY AND ALL LOSSES, DAMAGES, OR INJURIES

RESULTING FROM THE USE OF HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL THE MANUFACTURER BE LIABLE FOR INCIDENTAL, CONSEQUENTIAL, OR SPECIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THE PRODUCT. The Manufacturer must be promptly notified in writing of any claims, whether based in contract, tort, negligence, strict liability, or otherwise, to be eligible to receive either remedy stated above.

The terms of this LIMITED WARRANTY AND DISCLAIMER cannot be varied by any written or verbal statements or agreements at the point of sale or elsewhere. No employee or agent of the manufacturer or seller is authorized to vary or exceed the terms of this LIMITED WARRANTY AND DISCLAIMER in any manner.

APPENDIX

1. Front Panel Statements

- See next panel for additional Precautionary Statements and First Aid
- Net Weight ____ Pounds ____ Kilograms
- EPA Est. No. ____
- Contract manufactured for PBI/ Gordon Corporation
- Made in England, Argentina, India China or country name for WTO compliance

| Country of Origin | EPA Establishment No. | Container Size, pounds | Container Size, kilograms |
|-------------------|-----------------------|------------------------------|---------------------------|
| England | 15440-GBR-1 | | |
| Argentina | 46146-ARG-1 | 1850, 1940, 1984, 2150, 2250 | 840, 880, 900, 975, 1000 |
| India | 82614-IND-001 | 1850, 1940, 1984, 2150, 2250 | 840, 880, 900, 975, 1000 |
| USA | | | |
| China | 75464-CHN-1 | 1850, 1940, 1984, 2150, 2250 | 840, 880, 900, 975, 1000 |

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00455.20121127.amend-proposed-highlighted.doc

2. Reason for Issue: Addition of China as country of origin, China EPA Est. No.

