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James A. Armbruster, Ph.D.
 PFI/Gordon Corporation
 P.O. Box 4090
 1217 West 12th Street
 Kansas City, MO 64101

Dear Dr. Armbruster:

Subject: Compliance with 2,4-D Exposure Reduction Program
 Best 4 Servis Brand 2,4-D Isooctyl Ester Technical
 EPA Registration No. 2217-706
 Your Submission Dated October 21, 1992

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 Active Ingredients heading should be made singular.
- 2) We have noted that the previously approved label (dated August 5, 1980 through Falls Chemicals Inc.) expresses the Net Contents in terms of gallons. However, this labeling declares kilograms. Please explain this apparent anomaly.
- 3) The Statement of Practical Treatment should be removed from the Precautionary Statements. They should be placed under the separate heading "Statement of Practical Treatment" and should include the appropriate sub-headings.

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

CONCURRENCES							
SYMBOL	H7505C						
SURNAME	D. KENNY						
DATE	11/10/92						

BEST 4 SERVIS BRAND 2,4-D ISOOCTYL ESTER TECHNICAL

FOR FURTHER MANUFACTURING PURPOSES ONLY
NOT FOR RESALE

ACTIVE INGREDIENTS:

*Isooctyl ester of 2,4-dichlorophenoxyacetic acid	94.6%
INERT INGREDIENTS	5.4%
TOTAL	100.0%

*Equivalent to 62.7% 2,4-dichlorophenoxyacetic acid.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
Nov, 10, 1992
Under the FIFRA Insecticide,
Fungicide, and Plant Growth Regulator Act
as amended, this pesticide
registered under EPA Reg. No.
2217-706

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side panel for additional Precautionary Statements
and Statement of Practical Treatment.

NET CONTENTS: 230 KGS

/1092 APXXXXXX
EPA REG. NO. 2217-706
EPA EST. NO. 464-MI-1

M'd. for PBI/GORDON CORPORATION
KANSAS CITY, MISSOURI 64101

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

PRECAUTIONARY STATEMENTS

Hazards to Human and Domestic Animals

CAUTION: Causes irritation to eyes and skin. Do not get in eyes. Avoid contact with skin and clothing. In case of contact flush eyes with plenty of water for at least 15 minutes and get medical attention. Wash skin with plenty of soap and water.

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public waters unless this product is specifically identified and addressed in an NPDES permit. 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.

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

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 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."

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

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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. A 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) For Amine Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, and shoes and rubber gloves."; 3) For Amine Liquid Products carrying "WARNING" or "DANGER" signal word: "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) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; 5) For Acid, Sodium Salt and Ester Liquid Products carrying "WARNING" or "DANGER" signal word: "When using 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 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."

STORAGE & DISPOSAL

STORAGE: Store in original container. To prevent cross-contamination, do not store near other pesticides, fertilizers, food, feed, or seeds.

PRODUCT DISPOSAL: Do not contaminate water, food or feed by storage or 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: 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.

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.

EXCLUSIONS 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.