

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. James A. Armbruster, Ph.D.
PBI/Gordon Corporation
1217 West 12th Street
P.O. Box 4090
Kansas City, Missouri 64101-1407

JUN 29 1995

Dear Dr. Armbruster:

**SUBJECT: Confidential Statement of Formula and Label Amendment
Best 4 Servis Brand 2,4-D Isooctyl Ester Technical
EPA Registration No. 2217-706
Your Resubmission Dated May 22, 1995**

I. Confidential Statement of Formula:

The Confidential Statement of Formula (CSF), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A copy of the CSF (Basic Formulation), dated 5/22/95, has been placed in our file for the subject product. This CSF supersedes the previously accepted CSF for the subject product.

II. Label Amendment:

The labeling 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. Add the following oral statement of practical treatment from Dow Elanco's 2,4-D 2-Ethylhexyl Ester Technical (EPA Reg. No. 62719-26) product label, since the subject product is a 100 percent repack of Dow Elanco's product:

"IF SWALLOWED: Do not induce vomiting. Call a physician. Do not induce vomiting or give anything by mouth to an unconscious person."

2. Add the following sentence at the beginning of the Environmental Hazards section:

"This product is toxic to aquatic invertebrates."

3. Submit one copy of your final printed labeling before you release the product for shipment.

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CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Jun 26, 1995							

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

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

Enclosure

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

FOR MANUFACTURING PURPOSES ONLY

NOT FOR RESALE

ACCEPTED
with COMMENTS
In EPA Letter Dated
JUN 29 1995

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
2217-706

ACTIVE INGREDIENT:

Isooctyl (2-ethylhexyl) ester of 2,4-dichlorophenoxyacetic acid	94.4%
INERT INGREDIENTS	5.6%
	TOTAL 100.0%

Equivalent to 62.6% 2,4-dichlorophenoxyacetic acid or 6.0 lb./gal.
Isomer Specific by AOAC Method

KEEP OUT OF REACH OF CHILDREN

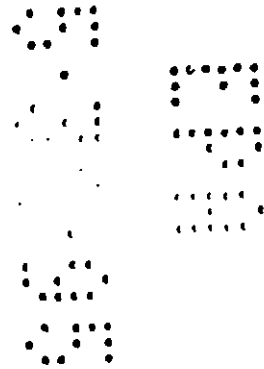
CAUTION

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

NET CONTENTS _____ GALLONS

EPA REG. NO. 2217-706
EPA EST. NO. 464-MI-1

Mfd. 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: Harmful if swallowed or absorbed through skin. Prolonged or frequently repeated skin contact may cause allergic skin reactions in some individuals.

Avoid breathing vapors. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling. When handling the product, wear chemical resistant gloves. Remove and wash contaminated clothing before reuse.

First Aid

IF IN EYES: Immediately flush eyes with plenty of water. Get medical attention if irritation persists.

IF ON SKIN: Immediately flush skin with plenty of water. Get medical attention if irritation persists.

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 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 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.

Only for formulation into an Herbicide for the following uses:

- (1) Agricultural (Corn, Sorghum, Wheat, Rice, Sugarcane, Pasture, Rangeland, Small Grains, Grasses, and Forestry Site Preparation.)

Industrial/Aquatic Uses:

Residential and Turf Uses: (including, but not limited to golf courses, residential/domestic, commercial, industrial, ornamental and institutional sites.)

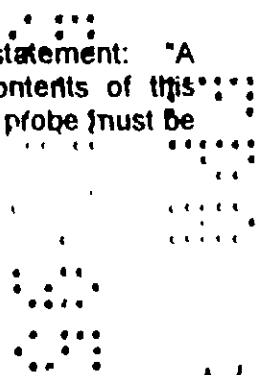
- (2) Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration

- (3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

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."



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SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

FOR AGRICULTURAL USES

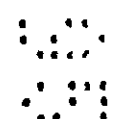
- a. **Clothing Requirement Statements:** "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety 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. A reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

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."

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; 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." 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; 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



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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.

- 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."

STORAGE & DISPOSAL

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

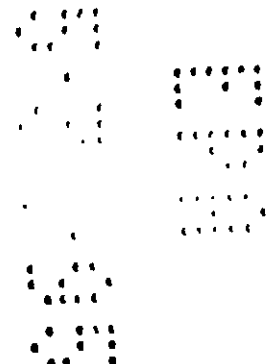
STORAGE: Store in original container.

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: 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.



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