

SEP 09 1994

Mr. Anthony Baldi
Aceto Agricultural Chemicals Corporation
One Hollow Lane
Lake Success, New York 11042-1215

Dear Mr. Baldi:

Subject: 2,4-DB 200 Weed Killer
EPA Registration No. 2749-516
Letter Dated July 29, 1993, Request To Update
Labeling and Name Change; Application Dated
August 26, 1993, Response To EPA Letter
Dated August 13, 1993, Application Dated
April 18, 1994, and Your Letters Dated June 4, 1994
and August 23, 1994

The proposed revised basic Confidential Statement of Formula submitted on EPA Form 8570-4 and dated August 23, 1994 has been reviewed and found to be an acceptable amendment to the subject pesticide product registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended. The new Confidential Statement of Formula has been added to the record for this product registration.

The proposed labeling submitted with your July 27, 1994 letter has been reviewed and found acceptable under the Act, provided that you:

1. Add the restriction "Do not graze or feed soybean hay within 60 days after application of this tank mix application." to the use-pattern described under "Directed Band Applications of Mixtures of 2,4-DB 200 and Lorox 50 W".
2. Submit five (5) printed copies of the final printed label before releasing the product for shipment.

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

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constitutes acceptance of these conditions.

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

Sincerely yours,

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

Enclosure

EWilson:Diskette ABC13:09-08-94

ACETO
2,4-DB 200 WEED KILLER

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For the control of certain seedling broadleaf weeds in peanuts, soybeans, and seedling stands of alfalfa, and for use on established stands of alfalfa.

ACTIVE INGREDIENT:

Dimethylamine salt of 4-(2,4-dichlorophenoxy) butyric acid*	25.9%
INERT INGREDIENTS	74.1%

TOTAL 100.0%

*4-(2,4-dichlorophenoxy) butyric acid equivalent to 21.9%; 2 lbs. per gallon.

EPA Registration No. 2749-516
EPA Establishment No.

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 09 1994

STOP — READ LABEL BEFORE USING

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.)

KEEP OUT OF REACH OF CHILDREN

DANGER-PELIGRO

STATEMENT OF PRACTICAL TREATMENT

If Swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.
If on Skin: Wash contaminated areas thoroughly with soap and water. Do not reuse contaminated clothing until washed. Get medical attention if irritation persists.
If in Eyes: Flush with plenty of water. Call a physician.

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

2749-516

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE
CALL TOLL FREE 1-800-424-9300
NET CONTENTS: 2.5 Gallon (9.46 Liters)

Manufactured for:
ACETO AGRICULTURAL CHEMICALS CORPORATION
1 Hollow Lane,
Lake Success, New York, 11042

**PRECAUTIONARY
STATEMENTS
DANGER**

**HAZARDS TO HUMANS AND DOMESTIC
ANIMALS**

Corrosive. Causes irreversible eye damage. Due to corrosive nature, may be harmful or fatal if swallowed. May be harmful if inhaled or absorbed through skin. Do not get in eyes, on skin or on clothing. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

Long-sleeved shirt and long pants

Waterproof gloves

Shoes plus socks

Protective eyewear

Chemical-resistant headgear for overhead exposure

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.

USER SAFETY RECOMMENDATIONS

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS: Do not apply directly to water, 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 washwaters. Do not contaminate water intended for irrigation or domestic purposes. Do not apply when weather conditions favor drift from target area.

GROUNDWATER CONTAMINATION: Most cases of groundwater contamination involving phenoxy herbicides such as 2, 4-DB have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2, 4-DB pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or 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.

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DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with this 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 (PPE) 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.

PPE required 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, is:

- coveralls
- waterproof gloves
- shoes plus socks
- protective eyewear
- chemical-resistant headgear for overhead exposure

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Store at temperatures above 32°F. If product is allowed to freeze, warm to 50°F and agitate thoroughly before using. Containers should not be stacked more than six (6) high. Reclose all partially used containers by thoroughly tightening screw cap. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spill with a suitable clay absorbent and dispose of as indicated under "Pesticide Disposal".

For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities.

To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification.

Opened, partially used pesticides should be stored in original *labeled* containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

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: 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.

Apply this product only as specified on this label.

NOTE: Avoid spray drift to susceptible plants and crops: cotton, tobacco, tomatoes, ornamentals, etc. Coarse sprays are less likely to drift.

Spray equipment previously used to apply another phenoxy must be thoroughly cleaned with alkali and water prior to use with 2,4-DB 200. Similarly after using 2,4-DB 200, wash sprayer thoroughly before using again to spray susceptible crops. Do not use near greenhouses. Observe all caution and limitations on labeling of all products used in mixtures.

Use agitation to keep solution well mixed, especially if it has been allowed to stand unagitated.

Calibrate sprayer accurately.

DO NOT APPLY WHEN CROP IS STRESSED FROM LACK OF MOISTURE.

DO NOT APPLY THIS PRODUCT THROUGH ANY TYPE OF IRRIGATION SYSTEM.

ALFALFA

APPLICATION:

For use in seedling alfalfa, spray when the crop has reached the 1 to 2 trifoliate leaf stage and growing conditions are good. In established alfalfa, certain weeds will emerge in the fall and over winter in a rosette stage. Best control of these weeds will result from application in late fall or early winter rather than in the spring. Do not apply after flowering.

WHEN TO APPLY:

Weeds must be in the young seedling stage and actively growing to achieve satisfactory results. For best results spray weeds in the 2 to 5 leaf stage of growth.

AMOUNT TO USE:

Apply 2,4-DB 200 as an overall spray by ground sprayer or airplane. Apply at rates listed below according to weed problems. Use the higher rate if weeds are past the seedling stage. Aerial applications should be made in 10 gallons of water per acre, while ground sprayer applications should be in 20 to 30 gallons of water per acre. Spray gallonage should give adequate coverage of the weeds without runoff. The use of an approved non-ionic surfactant for agricultural uses (such as X-77, Surfactant WK, etc.) at their label rates will usually result in better weed control, especially if weeds are beyond the seedling stage. Do not use with surfactant in the desert areas of Arizona and California.

BROADLEAF WEEDS

Rate of 2,4-DB 200 per Acre

Annual Morningglory (Ipomoea spp.)	4 pints
Cocklebur (Xanthium spp.)	
Common Lambsquarters (Chenopodium album)	
Jimsonweed (Datura stramonium)	
Kochia or Mexican Fireweed (Kochia scoparia)	
Pigweed (Amaranthus spp.)	
Velvetleaf (Abutilon theophrasti)	
Wild Turnip (Brassica campestris)	
Black Mustard (Brassica nigra)	6 pints
Buckhorn Plantain (Plantago lanceolata)	
Common Ragweed (Ambrosia artemisiifolia)	
Curly Dock (Rumex crispus)	
Field Pennycress (Fanweed or Stinkweed) (Thlaspi arvense)	
Hedge Smartweed (Polygonum scandens)	
Ladysthumb (Polygonum persicaria)	
Prickly Lettuce (Lactuca serriola)	
Shepherdspurse (Capsella bursa-pastoris)	
Sweetclover (Volunteer plants) (Melilotus spp.)	
Wild Beet (Beta maritima)	
Wild Mustard (Brassica kaber)	

Do not graze established alfalfa, nor feed straw or hay from established alfalfa to livestock within 30 days after application. Do not graze or feed SEEDLING alfalfa within 60 days after application. Irrigation, in particular, overhead sprinkler irrigation, should be delayed as long as possible (10 days or more) following application of 2,4-DB 200 to avoid washing the chemical into the root zone. Do not apply when crop is stressed from lack of moisture.

Apply as a postemergent spray. When properly timed there is little or no effect on the crop. In established alfalfa there may be some twisting of stems and malformation of leaves. This condition is usually outgrown. Do not spray when daytime temperatures are expected to exceed 90°F within the next 2 or 3 days. Do not apply if temperatures are likely to fall below 40°F during or shortly after treatment.

PEANUTS

APPLICATION:

Apply 2,4-DB 200 postemergent as an overall spray by ground sprayer or airplane. With ground applications use a boom sprayer with flat fan-type nozzle. Adjust the height of the boom above the crop so the growing terminals of weeds are sprayed. Use low pressure (about 20 to 40 lbs. per square inch). Do not use boom jet nozzles. With airplane applications 2,4-DB 200 has been successfully applied using 5 gallons of total solution per acre. The height of the application should insure THOROUGH COVERAGE of the tops of the weeds. Best control has resulted from aerial application with coarse spray when cocklebur is at least crop high and actively growing. Other weed species should be in the seedling stage and actively growing. Airplane application is not recommended in the vicinity of susceptible crops.

Do not apply if peanuts are suffering from lack of moisture.

AMOUNT TO USE:

Apply the recommended rates as indicated in the table below:

BROADLEAF WEEDS	Rate of 2,4-DB 200 per Acre
Cocklebur (Xanthium spp.)	0.9 pint (1 gal/9 acres)
Annual Morningglory (Ipomoea spp.)	1.6 pints (1 gal/5 acres)
Common Lambsquarters (Chenopodium album)	
Common Ragweed (Ambrosia artemisiifolia)	
Jimsonweed (Datura stramonium)	
Sicklepod (Coffeeweed) (Cassia obtusifolia)	
Velvetleaf (Abutilon theophrasti)	

Do not apply more than two (2) applications per season; the second application should be made no later than the late bloom stage of peanuts (about 90 to 100 days after planting). Do not feed treated peanut vines or peanut hay to livestock. Do not apply to peanuts within 30 days of harvest.

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SOYBEANS

APPLICATION:

Apply 2,4-DB 200 postemergent as an overall spray by ground sprayer or airplane. With ground applications use a boom sprayer with flat fan-type nozzles. Adjust the height of the boom above the crop so the growing terminals of all weeds are sprayed. Use low pressure (about 20 to 40 lbs. per square inch). Do not use boom jet nozzles. With airplane applications, 2,4-DB 200 has been successfully applied using 5 gallons of total spray solution per acre. The height of the application should insure thorough coverage of the tops of the weeds. Best control has resulted when cocklebur is at least crop high and actively growing. Airplane application is not recommended in the vicinity of susceptible crops. Do not spray if soybeans are suffering from lack of moisture.

TOPICAL (OVERHEAD) APPLICATIONS

Apply from 7 to 10 days before soybeans bloom through mid-bloom. A good indication that the beans are about to bloom is when the soybean plants have turned a dark green color. If application is made 7 to 10 days before bloom, apply 1 gallon of 2,4-DB 200 per 11 acres; if application is made from early-bloom through mid-bloom, apply 1 gallon of 2,4-DB 200 per 9 acres. Use sufficient water to obtain adequate coverage. The rates recommended are for the control of cocklebur. These rates will also stunt or partially control certain other weeds including Annual Morningglory, Velvetleaf, and Jimsonweed. In the Midwest use only a directed application since topical application may reduce soybean yields.

NOTICE: Application should not be made to sparsely foliated stands stressed because of disease or lack of moisture. It is essential that the canopy above the soybeans be complete. To apply the product otherwise could result in crop damage such as stalk and stem splitting, and reduction in yield.

DIRECTED APPLICATIONS

For best results, apply when weeds do not exceed 3 inches in height. Good coverage of the growing terminals of weeds is essential for effective control. Do not allow spray pattern to contact more than the lower one-third of the soybean plants. Do not apply more than two (2) applications per season. Precise application is essential to prevent damage to the crop. In order to maintain the correct spraying height, nozzles must be mounted on oiling shoes, skid shoes, or on cultivators with gauge wheels. Do not use booms with drop nozzles.

FIRST APPLICATION: Apply as a directed spray when soybeans are 8 to 12 inches tall and weeds have emerged.

SECOND APPLICATION: Apply as a directed spray no later than mid-bloom stage.

AMOUNT TO USE: Apply the recommended rates as indicated in the table below.

BROADLEAF WEEDS	Rate of 2,4-DB 200 per acre
Cocklebur (<i>Xanthium</i> spp.)	0.9 pint (1 gal/9 acres)
Annual Morningglory (<i>Ipomoea</i> spp.)	1.6 pints 1 gal/5 acres
Common Lambsquarters (<i>Chenopodium album</i>)	
Common Ragweed (<i>Ambrosia artemisiifolia</i>)	
Jimsonweed (<i>Datura stramonium</i>)	
Sicklepod (Coffeeweed) (<i>Cassia obtusifolia</i>)	
Velvetleaf (<i>Abitilon theophrasti</i>)	

While some temporary twisting of soybean plants may follow an application, this will have little or no permanent effect on the crop. Applications made under adverse growing conditions, such as periods of drought, will result in injury to the beans; under such conditions the crop should not be sprayed.

Do not spray 2,4-DB 200 on soybeans showing a general infestation of *Phytophthora*.

Do not apply more than the recommended amount.

Do not harvest soybeans within 60 days after application.

Do not use on soybeans grown West of the Rocky Mountains.

DIRECTED BAND APPLICATIONS OF MIXTURES OF 2,4-DB 200 AND LOROX 50 W

Application:

Apply directed spray when beans are at least 8 inches tall and when weeds do not exceed 2 inches in height. Direct spray to cover weed foliage with minimum contact of the soybean plant. Do not spray higher than 3 inches on the soybean stem or crop injury may result. Use an 8002T-Jet (or equivalent) or larger with a minimum of 25 gals. per broadcast acre and spray pressure of 20 to 25 psi, to avoid spray drift. For each 25 gals. of spray mixture a pint of surfactant such as Surfactant WK may be added. Continuous agitation in the spray tank is required to keep the material in suspension. Agitate by mechanical or hydraulic means; if by-pass or return line is used, it should terminate at the bottom of the tank to minimize foaming. Openings in nozzle screen should be equal to or larger than 50 mesh. Apply with sprayer nozzles mounted on skid shoes, oiling shoes, or on cultivators with gauge wheels. Do not mount on booms with drop nozzles or on cultivators without gauge wheels.

Amount to Use:

Apply the recommended rates as indicated in the table below.

BROADLEAF WEEDS	Rate of 2,4-DB 200 and Lorox per broadcast acre
Annual Morningglory (<i>Ipomoea</i> spp.)	0.9 pint
Cocklebur (<i>Xanthium</i> spp.)	+
Common Lambsquarters (<i>Chenopodium album</i>)	1 pound
Common Ragweed (<i>Ambrosia artemisiifolia</i>)	
Crabgrass (<i>Digitaria</i> spp.) (2 leaf)	
Jimsonweed (<i>Datura stramonium</i>)	
Prickly Sida (Teaweed) (<i>Sida spinosa</i>)	
Sesbania (<i>Sesbania</i> spp.)	
Velvetleaf (<i>Abitilon theophrasti</i>)	

Use a proportional amount of the two chemicals on the band (for example, on a 12 inch band in 36 inch rows use 1/3 pint of 2,4-DB 200 and 1/3 lb. of Lorox per acre). If a new flush of weeds occurs after initial treatment, make a second application but do not apply within 60 days of harvest or make more than 2 applications per growing season. Do not allow spray or spray drift to contact growing terminals of beans, as excessive crop injury will result. Do not feed soybean forage or hay to livestock from fields treated with this mixture. Harvested soybeans may be used for feed or oil purposes.

NOTE: Do not use on sands, loamy sands, gravelly soils, or on exposed subsoils. Do not use on soils containing less than 1/2% organic matter as crop injury may result. Observe all cautions and limitations of labeling of all products used in mixture.

NOTE: The Lorox 50 W, 2,4-DB 200 tank mix is not approved for use in California.

- Lorox 50 W-registered trademark of E. I. duPont de Nemours & Co. (Inc.)

NOTICE:

Seller warrants that the product conforms to its chemical description and is reasonably fit for the purposes stated on the label when used in accordance with directions under normal conditions of use, but neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to Seller, and Buyer assumes the risk of any such use.