

HELENA CHEMICAL COMPANY



CORPORATE OFFICE

February 12, 1993

Suite 500
6075 Poplar Avenue
Memphis, Tennessee 38119
Telephone: 901/761-0050
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Joanne I. Miller, Product Manager 23
U. S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division (H7505C)
401 M Street, S.W.
Washington, D.C. 20460

RE: BRUSH RHAP LOW VOLATILE 4D HERBICIDE, EPA REG. NO. 5905-498.
2,4-D EXPOSURE REDUCTION MEASURES

Dear Ms. Miller:

I, being an authorized representative of Helena Chemical Company certify that all containers of Brush Rhap Low Volatile 4D Herbicide, EPA Reg. No. 5905-498, produced by October 23, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products. I further certify that all containers of said product sold or distributed by this company by April 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products.

Sincerely,

HELENA CHEMICAL COMPANY

A handwritten signature in cursive script that reads "Judy Oldham".

Judy Oldham
Manager, Registration Services

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BRUSH-RHAP® LOW VOLATILE 4-D HERBICIDE

2,4-D LOW VOLATILE

ACTIVE INGREDIENT:

*2-Ethylhexyl Ester of 2,4-Dichlorophenoxyacetic Acid 65.40%

INERT INGREDIENTS: 34.60%

TOTAL 100.00%

*Equivalent to 43.4% 2,4-D Acid or 3.76 lb./gal.
Isomer specific by AOAC Method 6.D01-5 (12th Ed.)

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado ampliamente.

See Side Panel for Additional Precautionary Statements.

EPA REG. NO. 5905-498
EPA EST. NO.

NET CONTENTS:

MANUFACTURED BY
HELENA CHEMICAL COMPANY
MEMPHIS, TN 38119

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Avoid contact with skin, eyes, or clothing. Harmful if swallowed. Avoid inhaling vapor or spray mist. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

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. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

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.

If this container contains over 1 gallon and less than 5 gallons, persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron.

If this container contains 5 gallons or more in capacity, 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.

STATEMENT OF PRACTICAL TREATMENT

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF SWALLOWED: Call a physician or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person.

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

IF INHALED: Move victim to fresh air. Give artificial respiration if needed. Get medical attention.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not apply when weather conditions favor drift from target area. Spray equipment used in applying this product should be thoroughly cleaned before using for any other purpose. Use repeated flushing with soap and warm water or suitable chemical cleaner. It is best to use a separate sprayer for application of insecticides and fungicides. Do not contaminate water by cleaning of equipment or disposal of washwaters. This product will kill or seriously injure many desirable forms of vegetation. Do not apply directly to flowers, fruits, vegetables, grapes, ornamentals, cotton, or other desirable plants. Do not use when there is hazard from drifting mists. (Coarse sprays are less likely to drift.) Vapors from this product may injure susceptible plants in the immediate vicinity. Avoid contamination of water used for domestic purposes and irrigation purposes. Excessive amounts of this product in the soil may temporarily inhibit seed germination and plant growth.

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters.

GROUNDWATER CONTAMINATION

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D 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.

DIRECTIONS FOR USE

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

CHEMIGATION PROHIBITION

Do not apply this product through any type of irrigation system.

AGRICULTURAL USE REQUIREMENTS

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. Because certain states may require more restrictive reentry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

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, wear:

- long-sleeved shirt and long pants
- chemical-resistant gloves such as butyl or nitrile or barrier laminate
- socks and shoes
- protective eyewear (face shield or safety glasses)

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. (Indicate specific oral warnings which inform workers of areas or fields that may not be entered without specific protective clothing, period of time field must be vacated and appropriate actions to take in case of accidental exposure.) When oral warnings are given, warnings must be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information: CAUTION: Area treated with 2,4-D Low Volatile Herbicide on (date of application). Do not enter without appropriate protective clothing for 12 hours. (Insert here Statements of Practical Treatment as under Precautionary Statements.)

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed by storage or disposal. Do not store under conditions which might adversely affect the container or its ability to function properly.

STORAGE: Do not store below temperature of 0°F. If frozen, warm to 40°F and redissolve before using by rolling or shaking container. This product can be stored in an unheated building. Store in a safe manner. Store in original container only. Keep container tightly closed when not in use. Reduce stacking height where local conditions can affect package strength. Personnel should use clothing and equipment consistent with good pesticide handling.

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:

Metal: 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.

Plastic: 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.

This product can reach groundwater as a result of mixing and loading. To minimize groundwater contamination from spills during mixing, loading, and cleaning of equipment, take the following steps:

Mixing and Loading: When mixing, loading, or applying this product, wear personal protective clothing listed under the Hazards to Humans and Domestic animals section of this label.

The mixing and loading of spray mixtures into the spray equipment must be carried out on an impervious pad (i.e., concrete slab, plastic sheeting) large enough to catch any spilled material. If spills occur, contain the spill by using an absorbent material (e.g., sand, earth, or synthetic absorbent). Dispose of the contaminated absorbent material by placing in a plastic bag and following disposal instructions on this label.

Triple rinse empty containers and add the rinsate to the mixing tank.

Cleaning of Equipment: When cleaning equipment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources.

WHERE TO USE

BRUSH-RHAP® LOW VOLATILE 4-D is used for the control of broadleaved weeds, undesirable hardwood species, and brush in forest, rangeland, and pasture areas. Also for aquatic weed control.

PLANTS CONTROLLED

BRUSH-RHAP® LOW VOLATILE 4-D will kill or control the following as well as many other noxious plants susceptible to 2,4-D:

Alder	Cocklebur	Locoweed	Sagebrush
Alligatorweed	Coffeeweed	Madrone	Sassafras
Arrowhead	Creeping jenny	Manzanita	Shepherdspurse
Artichoke	Curly indigo	Mexicanweed	Smartweed
Bindweed (hedge, field, and European)	Dandelion	Morningglory	Sowthistle
Bitter wintercress	Dock	Mustard	Stinkweed
Boxelder	Dogwood	Nutgrass	Sumac
Buckhorn	Duckweed	Parrotfeather	Sunflower
Bull thistle	Elderberry	Pennywort	Tanoak
Bulrush	Goldenrod	Pigweed	Virginia creeper
Burdock	Ground ivy	Plantain	Water hyacinth
Bur ragweed	Hazel brush	Poison ivy	Water lily
Buttercup	Hemp	Polkweed	Water primrose
Canyon live oak	Hoary cress	Poplar	Wild garlic
Catnip	Honeysuckle	Povertyweed	Wild lettuce
Chickweed	Indigo	Puncturevine	Wild onion
Chicory	Ironweed	Purslane	Wild radish
	Jimsonweed	Rush	Willow
	Lambsquarters	Russian thistle	

DIRECTIONS FOR USE

Add the recommended amount of product to about one-half the volume of water to be used in spraying. Mix well, then add remaining water and mix until spray mixture is uniform.

For aerial spraying, thoroughly mix the required amount of chemical in oil. Add this mixture to a sufficient amount of water to insure adequate coverage. NOTE: This material forms an emulsion in water - not a solution and tends to separate on standing. Provide agitation in order to insure uniform spray mixtures. Best results are obtained when applications are made while the plants are well leafed and actively growing.

On Rangeland, Pastures, and for General Weed Control - Use 1 to 4 pints in sufficient water to give good coverage to one acre, depending on type of weeds and stage of growth. Use only on established stands of perennial grasses.

For Aquatic Weeds in Lakes, Ponds, Drainage Ditchbanks - Use 2-1/2 to 4-1/2 pints of product in 50 to 100 gallons of water per acre. Spray to wet foliage thoroughly. Application should be made when leaves are fully developed above water line and plants are actively growing. Your state Conservation Department or Game and Fish Commission will assist you in determining the best time and rate for application under local conditions.

DO NOT apply to more than 1/3 to 1/2 of a lake or pond in any one month, because excessive decaying vegetation may deplete oxygen of water, killing fish. Treatment should proceed stepwise in bands from the shore outwards to allow fish to move into untreated areas.

NOTE: Perennial and other hard-to-control weeds may require a repeat application to give adequate control.

USES IN FOREST MANAGEMENT

CONIFER RELEASE: For control of alder, apply 1-1/2 to 2 quarts of product per acre in sufficient volume to obtain proper contact and coverage and apply as a foliage spray between mid-May and mid-June.

For control of madrone, manzanita, oak, tanoak, and similar species to release hemlock, spruce, and firs, apply 3 quarts of product per acre in sufficient volume to obtain proper contact and coverage just prior to or during budbreak of Douglas fir.

For control of hazel brush and similar species in the Lake States area, apply 2 quarts of product per acre in sufficient volume to obtain proper contact and coverage when new shoot growth of hazel is complete.

SITE PREPARATION: (As Budbreak Spray) - For control of alder prior to planting seedlings, apply 2 to 4 quarts of product per acre in sufficient volume to obtain proper contact and coverage after alder budbreak but before foliage is 1/4 full size.

(As Foliage Spray) - For control of alder prior to planting seedlings, apply 2 quarts of product per acre in sufficient volume to obtain proper contact and coverage after most alder leaves are full size.

OBSERVE THESE PRECAUTIONS

Avoid application of spray or drift of spray to desirable plants, as this product may injure cotton, tomatoes, beans, peas, most vegetables, ornamentals, grapes, or others. Even minute quantities of the spray may cause severe injury. Accordingly application by airplanes should be made only when there is no hazard from drift. All sprays are likely to drift under certain conditions. The finer the spray, the greater the likelihood of drift effect. Coarse sprays are less likely to drift.

Use only amount needed. **DO NOT OVERDOSE.**

Since vapors of the ester in this product may injure susceptible plants in the vicinity, use only where there is no danger from such vaporization.

Be sure that airplane spraying equipment has a quick-acting, effective cutoff valve, and is used from the lowest possible altitude by an aircraft operator experienced in the application of herbicides.

Do not use same equipment for other purposes. If necessary to use sprayer for any other spraying, be sure to thoroughly clean all equipment with a suitable chemical cleaner. (1 qt. household ammonia in 20 to 25 gals. water - let stand overnight, then rinse thoroughly with water.)

Do not store or place near fertilizers, seeds, plants, insecticides, or fungicides. Do not reuse empty container. See Storage and Disposal statement.

Obtain necessary approval and/or permits for use in states or areas where required.

Excessive amounts of this product in the soil may temporarily inhibit seed germination or plant growth.

Users should note that herbicide treatment of public waters requires a permit from appropriate state agencies in most states. Your State Conservation Department or Game and Fish Commission will aid you in securing a permit if required in your state.

**CONDITIONS OF SALE - LIMITED WARRANTY
AND LIMITATIONS OF LIABILITY AND REMEDIES**

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions, the failure to follow the label directions, or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man, or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. The Company makes no other warranties or representations of any kind, express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

The exclusive remedy against the Company for any cause of action relating to the handling or use of this product is a claim for damage and in no event shall damages or any other recovery of any kind against the Company exceed the price of the product which causes the alleged loss, damage, injury, or other claim. The Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income.

The Company and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability, and remedies.