

28 SEP 1993

Judy Oldham
Helena Chemical Company
Suite 3200 - Clark Tower
5100 Poplar Avenue
Memphis, TN 38137

Dear Ms. Oldham:

Subject: Revised Labeling - Corrected Precautionary Language
Weed-Rhap A4-MCPA Herbicide
EPA Registration No. 5905-502
Your Submission Dated August 4, 1993

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) In the section for Preparing the Spray, the user should be instructed to add the remainder of the water after adding the required amount of product.

Please note that additional revisions to the labeling may be necessary upon the review of the outstanding dermal sensitization study. 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.

This acceptance of your label does not relieve you of any obligation to comply with the Worker Protection Standard (WPS). Under the WPS labeling regulations at 40 CFR part 156, subpart K, § 156.200(c)(3), you are prohibited from distributing or selling any product within the scope of the WPS requirements after April 21, 1994, without amended labeling accepted by the Agency.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

Enclosure

CONCURRENCES

SYMBOL	H7505C						
SURNAME	D. KENNAM						
DATE	9/27/93						

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WEED RHAP A4-MCPA

MCP AMINE HERBICIDE

For the Selective Control of Many Broadleaf Weeds in Flax, Small Grains, Rice, Peas, Clover, Alfalfa and Grass Pastures;
For Whitebrush Control; And For Weed Control in Non-Crop Areas

ACTIVE INGREDIENTS:

Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid 52.2%

INERT INGREDIENTS: 47.8%

Total 100.0%

ACCEPTED
with COMMENTS
in EPA Letter Dated

Equivalent to 42.6% or 4 pounds per gallon of MCPA.

28 SEP 1993

KEEP OUT OF REACH OF CHILDREN

DANGER

PELIGRO

5905-502

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

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

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.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

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

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See Additional Precautionary Statements on Inside Label:

EPA REG. NO.: 5905-502
EPA EST. NO.:

NET CONTENTS:

MANUFACTURED BY
HELENA CHEMICAL COMPANY
MEMPHIS, TN 38119

**PRECAUTIONARY STATEMENT
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Corrosive, causes irreversible eye damage. Harmful if swallowed, inhaled or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing dust, vapor or spray mist. Mixers/loaders or applicators are required to use face shields or goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Do not apply this product in such a manner as to directly or through drift expose workers or other persons. Unprotected persons must leave the area being treated.

ENVIRONMENTAL HAZARDS

Drift or run-off may adversely affect nontarget plants. For terrestrial uses, do not apply directly to water, or 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 or rinsate. Do not contaminate water intended for irrigation or domestic purposes. Do not apply when weather conditions favor drift from target sight.

GROUND WATER CONTAMINATION STATEMENT

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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.

CLEANING OF EQUIPMENT

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

DIRECTIONS FOR USE

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

RE-ENTRY

Do not enter treated area without protective clothing until sprays have dried. Protective clothing should include: Hat or other suitable head covering, long-sleeved shirt and long-legged trousers, or a coverall type garment, shoes and socks, Mixers/loaders/applicators are required to use face shields or goggles.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

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. The Precautionary Statements should read to workers as well as the instructions not to enter until sprays have dried. When oral warnings are given, warnings shall 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:

DANGER: Area treated with MCPA on (date of application). Do not enter without appropriate protective clothing until sprays have dried. (Insert here STATEMENTS OF PRACTICAL TREATMENT as on front panel.)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Do not store this product near fertilizers, seeds, insecticides, or fungicides. Protect product from freezing. If subjected to freezing conditions, warm to 70° F and agitate. This will return product to original condition. Reclose all partially used containers by thoroughly tightening the 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 waste 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), adding rinsate to the spray tank. 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.

GENERAL PRODUCT INFORMATION

USE PRECAUTIONS: MCP Amine Herbicide is injurious to most broadleaf plants. Salts are the least volatile forms of MCP and do not release enough vapors from treated areas to reduce yield of adjacent susceptible crops. This product is a salt of MCP. Susceptible plants may, however, be injured by physical drift from the application of this product. Do not apply directly to or otherwise permit even minute amounts (such as spray drift) to contact fruit trees, vegetables, flowers, ornamentals, or other desirable plants susceptible to MCP. DO NOT APPLY IN THE VICINITY OF COTTON, GRAPES, TOBACCO OR TOMATOES. Do not use in or near a greenhouse. Do not spray when wind is blowing towards susceptible crops or ornamental plants. Do not apply this product through any type of irrigation system.

Use coarse sprays to minimize spray drift since, under certain weather conditions, fine spray droplets may drift a mile or more. A spray thickening agent, such as Nalco-Trol® may be used with this product to aid in reducing spray drift. If used, follow all use recommendations and precautions on the product label.

(©, Nalco Chemical Company)

- With ground equipment spray drift can be lessened by:
1. Keeping the spray boom as low as possible.
 2. Applying 20 gallons or more of spray volume per acre.
 3. Using large-droplet producing nozzles.
 4. Using no more than 20 psi spray pressure at the nozzles.
 5. Spraying only when wind velocity is low.
 6. Stopping all spraying when wind exceeds 8 MPH.

Do not use hollow cone-type nozzles or other nozzles that produce large amounts of line spray droplets.

With aerial equipment, drift can be minimized by:

1. Using no more than 20 psi spray pressure at nozzles.
2. Using nozzle types and positions which do not produce fine spray droplets.
3. Using a spray boom no longer than 3/4 the wing or rotor span of the aircraft.
4. Spraying only when wind is less than 6 MPH.

Determine air movement and direction before foliar application. Use a smoke generator or other means at or near the application site for the detection of air movement, air stability, or temperature inversions. Such a condition exists when there is little or no wind and air temperature is lower near the ground than at higher levels. Use appropriate drift control measures or avoid application when smoke is moving toward nearby desirable susceptible plants or sensitive areas.

Excessive amounts of this herbicide in the soil may temporarily inhibit seed generation or plant growth. Violent windstorms may move soil particles. If MCP is on soil particles and they are blown onto susceptible plants, visible symptoms may appear. Serious injury is unlikely. The hazards of movement of MCP on dust is reduced if treated fields are irrigated or if rain occurs shortly after application.

To avoid injury to desirable plants, do not handle or apply other agricultural chemicals with the same equipment used for MCP unless it has been thoroughly cleaned with a suitable chemical cleaner.

Local conditions may affect the use of herbicides. Consult your State Agricultural Experiment Station or Extension Service Weed Specialists for advice in selecting treatments from this label to best fit local conditions. Be sure that the use of this product conforms to all applicable regulations. Apply this product only as specified on this label.

WHERE TO APPLY: MCP Amine Herbicide is used to control broadleaf weeds in flax, peas, small grains, established alfalfa and red clover, grass pastures, rangeland, and many non-crop areas. This product will kill or control the following weeds in addition to many other noxious plants susceptible to MCP.

Most Susceptible Weeds (most areas):

Arrowhead	Beggartick	Mustard	Pennycress (field)
Galinsoga	Goatsbeard	Ragweed	Shepherdspurse
Marshelder	Mint (dragonhead)	Water Plantain	Witchweed
Puncturevine	Redstem	and many	Croton (goatweed)
Sneezeweed	Stinkweed	other species	Lambsquarters
Yellow Rocket	Burdock	Cocklebur	Pepperweed (field)

(winter cress) Jimsonweed Kochia Sicklepod

Less Susceptible Weeds:

Burcucumber	Hoary Cress	Honeysuckle	Sunflower
Hempnettle	Sow Thistle	Stinging Nettle	Dandelion
Purslane	Wild Radish	Catsear	Pigweed
White Top	Canada Thistle	Plantain	Vetch
Buttercup			

WHEN TO APPLY: Apply the product during warm weather when weeds are young and actively growing. Uniform spray coverage is necessary for best results. Generally the low dosages listed will be satisfactory for young, succulent growth of sensitive weed species. For less sensitive species and under conditions where control is difficult, the higher dosages will be needed.

HOW TO APPLY:

PREPARING THE SPRAY: Mix the MCP Amine Herbicide with water unless otherwise indicated on the label. Fill the mixing tank or spray tank with approximately 1/2 the amount of water to be used for spraying. Add the required amount of product with agitation. NOTE: adding oil, wetting agents, or other adjuvants to the spray may reduce selectivity to crops, possible causing crop damage.

SPRAYING CONDITIONS: Use a moderate spray pressure of approximately 20 psi. Enough spray volume should be used to give good coverage of the weeds being sprayed. This is usually 5 to 30 gallons by ground application or 3 to 10 gallons by air. Higher spray volumes may be useful in some situations to provide better spray coverage when weeds are especially dense and/or to reduce spray drift.

WEED CONTROL APPLICATIONS

FLAX: For control of susceptible weeds, use 1/2 pint of MCP Amine Herbicide per acre. Treat flax when 3 to 6 inches tall before buds begin to form. Rates of 3/4 to 1 pint per acre may be needed to control some weeds such as wild buckwheat, smartweed and thistles but flax may be injured at these rates. If seeding grasses such as foxtail are a problem, DOWPON® M Grass Killer may be used alone or in combination with MCP Amine Herbicide. Flax varieties may vary in tolerance to DOWPON® M and MCP. Observe the most restrictive limitations, precautions, and directions for use on the product's labeling. Consult Local Extension Service or University Specialists for advise on herbicide use on flax. Do not forage or graze meat animals on treated areas within seven (7) days of slaughter.

WEED CONTROL IN SMALL GRAINS: NOTE: Do not permit dairy animals, or meat animals being finished for slaughter to forage or graze treated grain fields within two (2) weeks after treatment. Do not forage or graze meat animals on treated areas within seven (7) days of slaughter.

Wheat, Barley, Oats and Rye not underseeded to Legumes: Use 1/2 to 1 pint MCP Amine Herbicide per acre for the most susceptible weeds when grains are in the 3 to 5 leaf stage or up to early boot stage. Apply when weeds are very small for best results. Use up to 3 pints MCP Amine Herbicide per acre for the less susceptible weeds after crop has tillered but not later than early boot stage. Do not apply during the boot to dough stage of the grain.

RICE: For control of certain broadleaf weeds and sedges, apply 2 to 3 pints of MCP Amine Herbicide in 10 to 30 gallons of water per acre. Treat when rice is fully tillered and 6 to 8 inches above water,

usually 35 to 65 days after planting. Do not treat when rice is in the early seedling, boot, or early heading stages or when air temperature is over 90°F. Some rice varieties may be less tolerant to MCP than others. Consult your Agricultural Experiment Station or Extension Service Weed Specialists for appropriate rates and timing of MCP spray and on the tolerance of rice varieties. Do not grow crayfish or catfish in treated rice fields.

RICE IN CALIFORNIA: For early season broadleaf weed and sedge control in rice, apply 1 to 1½ pints of MCP Amine Herbicide per acre by air in 8 to 10 gallons of total spray volume, when rice is in the 3 to 4 leaf stage, and with well established root systems, usually 18 to 24 days after planting. Applications made during hot weather or at the higher dosage rate may cause temporary stunting of the rice. For maximum effectiveness, the weeds should be exposed at time of treatment. If retreatment is necessary, usually 35 to 65 days after planting, the total amount of MCP Amine Herbicide per acre, applied in the two applications, must not exceed 3 pints per season. Do not grow crayfish or catfish in treated rice fields.

PEAS: Use on peas to control susceptible weeds only where recommended by local Agricultural Extension Service or experiment station specialists. Use 1/4 to 1/3 pint of MCP Amine Herbicide in at least 15 gallons of water per acre when peas are 3 to 7 inches tall, before first flowering, and weeds are small. Higher rates of 1/2 to 3/4 pint per acre may be used to improve control of difficult weeds, but crop injury is more likely to occur. Do not apply if peas are taller than 7 inches or when they are stressed for lack of soil moisture. Do not apply when air temperature is over 90°F. Do not feed treated vines to livestock. Do not forage or graze treated pea fields. **NOTE: MCP can cause injury and delayed maturity in the pea crop.**

ESTABLISHED ALFALFA OR RED CLOVER: For control of yellow rocket and other susceptible annual weeds such as pennycress or tanweed, use 1 pint of MCP Amine Herbicide per acre. Apply in late fall after frost has killed legume top-growth and legumes are dormant. The temperature at time of spraying should be above 40°F.

GRASS PASTURES (INCLUDING GRASS GROWN FOR SEED): Use 2 to 4 pints of MCP Amine Herbicide per acre. Apply when weeds are small and actively growing for best results. Use the higher rates for whitetop., Canada thistle, buttercup and other more difficult to control weeds. Spray perennials in early bud to full bloom stage and regrowth in fall. Legumes may be injured or killed. Do not use this treatment where legumes, especially alfalfa, are present and desirable. In some areas bent, buffalo, carpet and St. Augustine grasses may be susceptible to injury. Do not use on newly seeded areas until grass is well established. Do not use from early boot to milk stage where grass seed production is desired.

CONTROL OF WHITEBUSH ON RANGELAND: Use 3 pints of MCP Amine Herbicide with 1 gallon of diesel oil and enough water for good spray coverage, usually 6 to 10 gallons per acre, by aircraft. Apply in spring or fall when plant foliage is well developed and actively growing. Spraying during bloom is recommended but not immediately after shedding of blossoms. Retreatments may be needed in succeeding years. **NOTE:** First mix the MCP Amine Herbicide in the water, then add the oil with agitation. Spray must be kept agitated during spraying to avoid separation in the tank.

NON-CROP AREAS: For control of susceptible weeds in fencerows, fallowlands, rights-of-way,

roadsides, and similar areas, use 6 pints of product per acre in enough water to give sufficient coverage. **NOTE:** on fallow land, do not plant any crop for 3 months after treatment or until chemical has disappeared from soil.

SPOT TREATMENT: For weed control in pastures, rangelands and in non-crop areas such as fencerows, farmyards, shelter-belts and roadsides: Use ¼ pint of **MCP Amine Herbicide** in 3 gallons of water to control weeds such as Canada thistle, whitetop, meadow buttercup and Texas blueweed. Apply when weeds are growing vigorously, usually prior to bloom, and spray fall regrowth if necessary.

**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.

