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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAR 16 1994

Judy Oldham
Helena Chemical Company
6075 Poplar Avenue
Suite 500
Memphis, TN 38119

Dear Ms. Oldham:

Subject: Revised Labeling and Commitment to Perform Dermal
Sensitization Study
Transvaal Weed-Rhap LV-4 MCPA Herbicide
EPA Registration No. 5905-506
Your Submission Dated February 9, 1994

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) Due to new EPA policy, part of the Environmental Hazards section has been changed. To comply, change the sentence "Do not apply to water" to read "Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark."
- 2) This label must be revised to incorporate the Worker Protection Standards as outlined in PR Notices 93-7 and 93-11.

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.

We acknowledge your commitment to perform the dermal sensitization study as required in the Agency correspondence dated January 14, 1994. We will await the submission of the required study.

Sincerely yours,

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

Enclosure

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Printed on Recycled Paper

2

TRANSCVAAL WEED RHAP LV-4 MCPA

MCP ESTER HERBICIDE

FOR THE SELECTIVE CONTROL OF MANY BROADLEAF WEEDS IN WHEAT, OATS,
BARLEY, RYE, FLAX, GRASSLAND, AND IN NON-CROP AREAS.

ACTIVE INGREDIENT:

Isooctyl Ester of 2-Methyl-4-Chlorophenoxyacetic Acid	74.4%
INERT INGREDIENTS:	<u>25.6%</u>
TOTAL	100.0%

Equivalent to 47.7% or 4 pounds per gallon of MCPA.

Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side Panel For Additional Precautionary Statements.

EPA REG. NO. 5905-506
EPA EST. NO.

NET CONTENTS:

MANUFACTURED BY
HELENA CHEMICAL COMPANY
MEMPHIS, TN 38119

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ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 16 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
5905-506

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or poison control center. Drink 1 or 2 glasses of water. Do not induce vomiting.

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

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

ENVIRONMENTAL HAZARDS

Do not apply directly to water. This product is toxic to fish. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water intended for irrigation or domestic purposes. Do not apply when weather conditions favor drift from target area.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame. Do not cut or weld container.

DIRECTIONS FOR USE

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

REENTRY STATEMENT

DO NOT enter treated areas 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.

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 be read to workers as well as the instruction 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: CAUTION: Area treated with MCPA on (date of application). Do not enter without appropriate protective clothing until sprays have dried.

21

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 degrees 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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.

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GENERAL PRODUCT INFORMATION

USE PRECAUTIONS: MCP ester herbicide is injurious to most broadleaf plants. Although this product contains material of low volatility, use it with caution where the spreading of vapors can damage nearby susceptible plants.

Physical drift from the application of this product may also cause injury to susceptible plants. 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.

Use course 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.

*TM, Nalco Chemical Co.

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 fine spray droplets.

With aerial equipment, drift can be minimized by:

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

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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 hazard of movement of MCP on dust is reduced if treated fields are irrigated or if rain occurs shortly after application.

6

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 ester is used to control broadleaf weeds in flax, small grains, grass pastures, rangeland, and many non-crop areas. The product will kill or control the following weeds in addition to many other noxious plants susceptible to MCP.

More Susceptible Weeds (most areas):

Arrowhead	Beggartick	Burdock	Cocklebur
Croton (goatweed)	Galinsoga	Goatsbeard	Jimsonweed
Kochia	Lambsquarters	Marshelder	Mint (dragonhead)
Mustard	Pennycress (field)	Pepperweed (field)	Puncturevine
Redstem	Ragweed	Shepherdspurse	Sicklepod
Sneezeweed	Stinkweed	Water Plantain	Wild Radish
Witchweed	Yellow Rocket (winter cress)		

and many other species.

Less Susceptible Weeds:

Burcucumber	Buttercup	Canada Thistle	Catsear
Chervil	Dandelion	Hempnettle	Hoary Cress
Honeysuckle	Miner's Lettuce	Plantain	Pigweed
Purslane	Sow Thistle	Stinging Nettle	Sunflower
Vetch	White Top		

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 lower 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 dosage will be needed.

HOW TO APPLY: PREPARING THE SPRAY: Mix the MCP ester 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. Add the remainder of the water while continuing to agitate. Note: adding oil, wetting agent, or other adjuvants to the spray may reduce selectivity to crops, possibly 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.

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WEED CONTROL APPLICATIONS

FLAX: Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Use sufficient water to give uniform and adequate coverage. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present it may be necessary to go as high as 3/4 pint per acre to prevent seed head production. Some injury to the flax may result. Flax varieties may vary in tolerance to MCP. Consult local Extension Service or University Specialists for advice on herbicide use in flax. Do not forage or graze meat animals on treated areas within 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 2 weeks after treatment. Do not forage or graze meat animals on treated areas within seven days of slaughter.

Wheat, Barley, Oats and Rye: Use 1/2 to 1 pint of MCP ester per acre for the more susceptible weeds when grains are in the 3-to-4 leaf stage or up to early boot stage. Apply when weeds are very small for best results. Use up to 3 pints MCP ester 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.

ESTABLISHED GRASSLANDS: Use 1 to 3 pints of MCP ester 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.

GRASSES GROWN FOR SEED: Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered. Do not use from early boot to milk stage.

NOTE FOR WEED CONTROL IN GRASSES: 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.

NON-CROP AREAS: For control of susceptible weeds in fencerows, fallow lands, rights-of-way, roadsides, and similar areas, use 6 pints of product per acre in enough water to give sufficient coverage. NOTE: on fallowland, do not plant any crop until 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 1/4 pint of MCP ester 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.

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**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.

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