

5905-507

1/3/2003

1/8

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0090. Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

Registration  
 Amendment  
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-507	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Weed Rhap Low Volatile Granular D	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b> JAN 3 - 2003
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)  
Amended draft labeling by notification per PR Notice 98-10 to correct typographical errors. Certification attached in correspondence.

Section - III

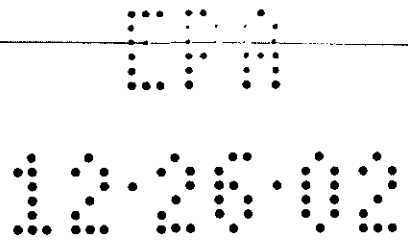
1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Emily Smathers Ratliff	Title Product Registration Supervisor	Telephone No. (include Area Code) 901/752-4421
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Product Registration Supervisor	
4. Typed Name Emily Smathers Ratliff	5. Date 12/19/2002	



**HELENA CHEMICAL COMPANY**  
225 Schilling Blvd., Suite 300  
Collierville, Tennessee 38017  
Telephone: 901/761-0050



**VIA FEDERAL EXPRESS**

December 19, 2002

Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504C)  
U. S. Environmental Protection Agency  
1921 Jefferson Davis Highway  
Crystal Mall #2; Room 266A  
Arlington, VA 22202

**RE: AMENDMENT BY NOTIFICATION TO CORRECT TYPOGRAPHICAL/PRINTING ERROR**

- |   |          |
|---|----------|
| 1. 2,4-D AMINE                                  | 5905-72  |
| 2. 2,4-D LV ESTER                               | 5905-93  |
| 3. 2,4-D LV ESTER 4                             | 5905-90  |
| 4. 3 LB. CHLORATE DEFOLIANT-DESICCANT           | 5905-118 |
| 5. 3.5 LB. LIQUID COPPER CONCENTRATE            | 5905-483 |
| 6. 6 LB. SODIUM CHLORATE DEFOLIANT-DESICCANT    | 5905-461 |
| 7. ATRAZINE 4L                                  | 5905-470 |
| 8. ATRAZINE 90DF                                | 5905-522 |
| 9. BRUSH RHAP LV 4-D HERBICIDE                  | 5905-98  |
| 10. CITRUSPERSE SULPHUR                         | 5905-350 |
| 11. COPPER-Z 8/2 GRANULAR                       | 5905-524 |
| 12. DUSTING SULPHUR                             | 5905-288 |
| 13. HELENA 3.5 LB LIQUID COPPER CONCENTRATE     | 5905-483 |
| 14. LIQUID SULFUR SIX                           | 5905-437 |
| 15. MSMA PLUS HC                                | 5905-164 |
| 16. MSMA PLUS                                   | 5905-66  |
| 17. MSMA ARSONATE LIQUID                        | 5905-67  |
| 18. PAR F 70 SOLUBLE OIL                        | 5905-520 |
| 19. SOL OIL 97                                  | 5905-294 |
| 20. WEED RHAP A-4D                              | 5905-501 |
| 21. WEED RHAP A-6D                              | 5905-503 |
| 22. WEED RHAP LOW VOLATILE GRANULAR D HERBICIDE | 5905-507 |
| 23. WEED RHAP LV-6D                             | 5905-508 |
| 24. WEED RHAP LV-4D                             | 5905-505 |

Dear Sherada:

Attached is draft amended labeling for the above referenced Helena Chemical Company products. All of these products are being amended by notification as allowed by PR Notice 98-10. The change consists only of a correction to the First Aid Statement which had a typographical/printing error caused by copy and paste on all items (except Weed Rhap A-4D 5905-501 – we are also doing a warranty update on

Letter from Helena Chemical Company to Sherada Hobgood – U. S. EPA December 19, 2002

that label). Per the PM's on this topic, as well as Linda, this type of correction, which would usually be just a non-notification is better done by a notification in this case, therefore:

I hereby certify that these notifications are consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

In support of this action, please find the following enclosed for each of the listed products:

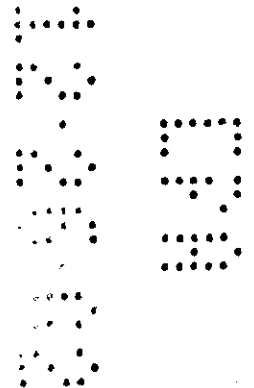
- 1. EPA Form 8570-1 – Application for Registration for Each
- 2. Two (2) Copies of Draft Amended Labeling for Each

If there are any questions about this submission, please contact me at 901-752-4421. Thank you for your attention to and assistance with this matter.

Sincerely,  
HELENA CHEMICAL COMPANY



Emily Smathers Ratliff  
Product Registration Supervisor



4/B

# WEED RHAP LOW VOLATILE GRANULAR D HERBICIDE 2,4-D LOW VOLATILE

**ACTIVE INGREDIENT:**

2-Ethylhexyl Ester\* of 2,4-Dichlorophenoxyacetic Acid ..... 28.4%\*\*

**INERT INGREDIENT:** ..... 71.6%

**TOTAL**..... 100.0%

\*\*Equivalent to 18.8% of 2,4-D AE by weight  
Isomer specific by AOAC Method 6.275 (13th Ed.), 1980.

\*An isoocetyl ester

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

### 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.

#### FIRST AID

<b>IF IN EYES:</b>	<ul style="list-style-type: none"> <li>• Hold eyelid open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a poison control center or doctor immediately for treatment advice.</li> </ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Have a person sip a glass of water if able to swallow.</li> <li>• Do not give anything to an unconscious or convulsing person.</li> </ul>
<b>IF ON SKIN OR CLOTHING:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor immediately for treatment advice.</li> </ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"> <li>• Move victim to fresh air.</li> <li>• If not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>

#### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. In case of emergency, call ChemTrec at 1-800-424-9300.

**See Inside Panel for Additional Precautionary Statements.**

EPA REG. NO. 5905-507  
EPA EST. NO.

NET CONTENTS:

**MANUFACTURED BY  
HELENA CHEMICAL COMPANY  
225 SCHILLING BOULEVARD, SUITE 300  
COLLIERVILLE, TENNESSEE 38017**

**NOTIFICATION  
JAN 3 - 2003**

5/8

## PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

If this container contains over 1 gallon and less than 5 gallons, mixers and loaders who do not use a mechanical system (probe and pump) to transfer the contents of this container must wear coveralls or a chemical-resistant apron in addition to the other required PPE.

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. After each day of use, clothing or PPE must not be reused until it has been cleaned.

### Engineering Controls Statements

If this container contains 5 gallons or more in capacity, do not open or pour. A mechanical system (such as a probe and pump or spigot) 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. If the mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4)], the handler PPE requirements may be reduced or modified as specified in the WPS.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(D)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove contaminated clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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 or to areas where surface water is present or to intertidal areas below the mean high water mark. 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.

6/8

### 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.

### CHEMIGATION PROHIBITION

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

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its 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 entry into treated areas during the restricted entry interval (REI) of 12 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
- Chemical-resistant gloves
- Shoes plus socks
- Protective eyewear

### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

For Turf Sites (excluding sod farms): Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until dust has settled.

### 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 0o F. If frozen, warm to 40o 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:** Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

This product can reach groundwater from improper handling. To minimize groundwater contamination from spills during loading, and cleaning of equipment, take the following steps:

**Handling:** When handling this product, wear chemical resistant gloves. Wash nondisposable gloves thoroughly with soap and water before removing. If spills occur, collect the material and dispose of by following disposal instructions on this label.

**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.

**GENERAL INFORMATION**

Weed Rhap Low Volatile Granular D is formulated by impregnating selected mineral granules with low volatile 2,4-D ester, to minimize drift. The 24/48 mesh size is recommended for the control of certain weeds which infest turf grass and crops such as corn, strawberries, and cranberries.

Avoid application to susceptible plants, because this product may injure plants such as cotton, soybeans, tomatoes, beans, fruit trees, and ornamentals. DO NOT allow particles or dust to drift onto desirable crops or plants.

Although this product contains a low volatile ester, it should be used with caution where spreading vapors can damage nearby susceptible plants.

It is best to use separate equipment for applying 2,4-D granules. Should the same equipment be used for applying other materials, however, clean it thoroughly before such use to remove all traces of 2,4-D particles or dust.

**APPLICATION INSTRUCTIONS**

**ORNAMENTAL TURF** such as lawns, golf courses, cemeteries, and parkways: To control wild onion and broadleaved weeds such as dandelion, plantain, ivy, bitterweed, and dogfennel, apply 10 to 15 lbs. of granules per acre in early spring when shoots are young and actively growing, using a mechanical spreader. Repeat application in one month to control skipped spots. Weeds over 6 inches tall are sometimes resistant and should be sprayed with Weed Rhap A-4D or Weed Rhap Low Volatile 4D.

**NOTES FOR ALL TURF SITES:** (excluding sod farms):

The maximum number of broadcast applications per treatment site is 2 per year.

**DO NOT USE** on bentgrass, St. Augustine grass, dichondra, carpetgrass, or newly plugged or seeded turf.

**IN CORN:** For pre-emergence application to aid control of annual grasses such as large and small foxtail, crabgrass, and barnyardgrass; and broadleaved weeds such as smartweed, sunflower, wild mustard, cocklebur, bindweed, dandelion, and morningglory, apply as follows: With a granule applicator designed to apply a band over the planted row, apply 3 to 3-1/4 lbs. per acre in a band 14 inches wide when rows are 42 inches apart. If the planting varies from this standard band width, or row separation, the granules should be applied proportionally. Be sure the granules are allowed to stay on top of the soil, preferably, they should be applied behind the packer wheel at planting time. Be sure the corn is planted 2-1/2 to 3 inches deep, as damage may occur to shallow planted corn. **DO NOT** apply on sandy soil. (For Corn Belt Only).

**IN STRAWBERRIES:** For pre-emergent application to control weeds such as crabgrass, foxtail, barnyardgrass or wintergrass, horseweed, bullnettle, carelessnessweed, morningglory, dock, smartweed, jimsonweed, and dandelion: Apply at the rate of 12 lbs. per acre over the planted area. Application should be made broadcast using a spreader-seeder previously

adjusted to deliver 12 lbs. per acre. Application should be made only in the dormant season (after first fall frost or before new leafing in spring).

**IN CRANBERRIES:** For pre-emergent application to control annual broadleaved weeds in bearing cranberry marshes, apply at a rate of 10 to 20 lbs. per acre (2 to 4 lbs. 2,4-D equivalent per acre). Application should be made broadcast in the spring after removal of the winter flood from the dormant vines. Weeds controlled are common ragweed, sticktight, teathumb, smartweed, Northern Saint Johnswort, and common species of annual smartweed. Careful distribution of the granules is necessary if adequate control is to be obtained. Granules may also be distributed on ice over plants prior to spring thaw (for Wisconsin area).

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

**Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.**

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 or 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 shall be limited to, at Helena Chemical Company's election, one of the following:

- 1. Refund of the purchase price paid by buyer or user for product bought, or
- 2. Replacement of the product used

To the extent allowed by law, 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.

© Copyright Helena Chemical Company, 2003.