

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
MCPA Sodium Salt
EPA Registration No. 5905-510
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 provision:

The Active Ingredients heading should be made singular.

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 change, 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. KEENEY						
DATE	9/27/93						

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MCPA SODIUM SALT

MCPA Sodium Salt herbicide

For the Selective Control of Many Broadleaf Weeds in Flax, Small Grains, Rice, Peas, Grain Sorghum, Grasslands and Pastures, Established Lawns and Turf, Grasses Grown for Seed, and Non-Crop Areas.

ACTIVE INGREDIENTS:

2-methyl-4-chlorophenoxyacetic acid, sodium salt 23.7%

INERT INGREDIENTS: 76.3%

TOTAL 100.0%

(Equivalent to 21.4% 2-methyl-4-chlorophenoxyacetic acid or not less than 2 pounds per gallon of MCPA)

KEEP OUT OF REACH OF CHILDREN

DANGER

PELIGRO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que le etiqueta haya sido explicado 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 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. 5905-510

EPA EST. NO.

NET CONTENTS:

ACCEPTED
with COMMENTS
in EPA Letter Dated:

28 SEP 1993

MANUFACTURED BY
HELENA CHEMICAL COMPANY
MEMPHIS, TN. 38119

Under the Fungicide, Insecticide, and Plant Growth Regulator Act, as amended, this product is registered under EPA Reg. No. 5905-510.

5905-510

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

DANGER

Corrosive, causes irreversible eye damage. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. 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 area.

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 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. 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 be 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 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: 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: MCPA Sodium Herbicide is injurious to most broadleaf plants. Salts are the least volatile forms of MCPA and do not release enough vapors from treated areas to reduce yield of adjacent susceptible crops. This product is a salt of MCPA. 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 MCPA. 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 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.

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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. 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.

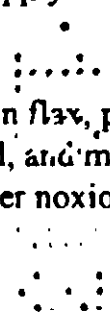
Determine air movement and direction before foliar application. Use a smoke generator or other means at or near the application site for the detection of air movement, air stability or temperature inversions. Such a condition exists when there is little or no wind and air temperature is lower near the 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 germination or plant growth. Violent windstorms may move soil particles. If MCPA is on soil particles and they are blown onto susceptible plants, visible symptoms may appear. Serious injury is unlikely. The hazard of movement of MCPA 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 MCPA, 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 of Extension Service Weed Specialists for advise 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: MCPA Sodium Herbicide is used to control broadleaf weeds in flax, peas, small grains, grasslands and pastures, established lawns and turf, grasses grown for seed, and many non-crop areas. The product will kill or control the following weeds in addition to many other noxious plants susceptible to MCPA.



More susceptible weeds (most areas):

Arrowhead	Beggartick	Burdock	Cocklebur	Croton
Galinsoga	Goatsbeard	Jimsonweed	Kochia	(goatweed)
Lambsquarter	Marshelder	Mint (dragonhead)	Mustards	Pennycress
Pepperweed (field)	Puncturevine	Ragweed	Redstem	Shepherds-
Sicklepod	Sneezeweed	Stinkweed	Water Plantain	purse
Witchweed	Yellow Rocket (winter cress)			

and many other species.

Less susceptible weeds:

Burcucumber	Buttercups	Canada Thistle	Catsear	Dandelion
Hempnettle	Hoary Cress	Honeysuckle	Plantains	Pigweed
Purslane	Russian Thistle	Sow Thistle	Stinging Nettle	Sunflower
Vetch White Top	Wild Radish	Silverleaf Nightshade		

In Rice - California:

Arrowhead (non-bulb)	Burhead	Redstem
Rough Seeded Bulrush	Water Hyssop	Water Plantain

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 dosages will be needed.

HOW TO APPLY: PREPARING THE SPRAY: Mix the MCPA Sodium 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. Add the remainder of the water while continuing to agitate. **NOTE: adding oil, wetting agents, 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.

WEED CONTROL APPLICATIONS

FLAX: For control of susceptible weeds, use 1/3 to 1 pint of MCPA Sodium Herbicide per acre in 20 to 50 gallons of water by ground application or 10 gallons of water by air. Treat when the flax has at least 3 to 4 leaves, or when 3 to 6 inches tall, but before buds begin to form. Treatment after early bud stage may result in severe damage. Rates of 1 1/4 to 1 1/2 pints 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 seedling grasses such as foxtail are a problem, DOWPON® M Grass Killer may be used alone or in combination with MCPA Sodium Herbicide. Flax varieties may vary in tolerance to DOWPON M and MCPA. Observe the most restrictive limitations, precautions, and directions for use on the product's labeling. Consult local Extension Service or University Specialists for advice on herbicide use in flax. Do not

spray flax underseeded with legumes without first consulting local weed specialists. 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 to 3 pints of MCPA Sodium Herbicide per acre for the more 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 MCPA Sodium 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.

Wheat, Barley, Oats and Rye underseeded in Alfalfa, Alsike, Birdsfoot Trefoil, Lespedeza, Red, White, or Ladino Clover: For emergency control of serious infestations of mustard, yellow rocket and other susceptible broadleaf weeds, apply 1/2 to 1 pint in not more than 5 to 10 gallons of water per acre. Make application after cereal is well tillered (4 to 8 inches tall) and before reaching boot stage. The nurse crop and weeds should provide a protecting canopy which, together with the use of low gallonage applied at low pressure, will reduce the risk of damage to the legumes. Do not use where small seeded legumes, especially vetch, sweet clover, trefoil or alfalfa, are seeded unless injury to them can be tolerated. There is also some risk to other legumes if only thinly protected by a canopy.

Emergency treatment of perennial broadleaf weeds in wheat: Apply 6 pints per acre when weeds are approaching bud stage, but do not spray grain in the boot to dough stage. The 6 pint (1.5 pound acid equivalent) per acre application of any MCPA product can produce injury to wheat. Balance the severity of your weed problem against the possibility of crop damage. Where perennial weeds are scattered, spot treatment is suggested to minimize the extent of crop injury. Treat in the spring when grain is fully tillered and 8 to 10 inches tall.

RICE: MCPA Sodium Herbicide can be used to replace 2,4-D in the weed spraying programs. Consult your Agricultural Experiment Station of Extension Service Weed Specialists for appropriate rates and timing of MCPA spray and on the tolerance of rice varieties. Observe the same precautions against drift onto cotton and other susceptible crops as for 2,4-D spraying. Treated effluent waters may be harmful to fish and other aquatic life. Apply 3 to 5 pints per acre in sufficient water (10 to 100 gallons) to give coverage. Use lower rate where Arrowhead, Water Plantain, and Redstem are the only weeds. Use the 5 pint rate where sedge and bulrush are also present. Make application only when weeds are present and where rice is well established, 6 to 8 inches above water, no sooner than 35 and no later than 65 days after seeding or when crop stems begin to elongate. Water should not be less than 2 to 3 inches deep at shallowest point. Do not spray after rice is in the boot stage, or when temperatures are over 90°F. Do not grow crayfish or catfish in treated rice fields.

PEAS: For control of mustard, lambsquarters and other susceptible weeds use 1/2 to 1 1/2 pints in 20 to 60 gallons of water per acre. For aerial application use 10 gallons total spray solution per acre. Adjust dosage rates to air temperatures as follows:

- Less than 55°F - 1 pint per acre
- 55°F to 70°F - 4/5 pint per acre

70°f to 80°f - 1/2 pint per acre

Apply after weeds emerge and before they are 3 inches tall. Do not apply later than the 3 node stage of growth of the peas before the blooming period. Do not apply if peas are taller than 7 inches or when they are stressed for lack of soil moisture. Do not feed treated vines to livestock. Do not graze or forage treated pea fields. Note: Consult State Extension Service personnel or cannery company fieldsmen for proper timing of applications with regard to varietal differences of growth rate. Do not apply when air temperature is over 90°F. **NOTE: MCPA can cause injury and delayed maturity in the pea crop.**

GRAIN SORGHUM: MCPA Sodium Herbicide used in grain sorghum will control weeds such as Pigweed, Lambsquarters, Shepherdspurse, Purslane, and Narrowleaf Goosefoot. Apply when sorghum is 6 to 12 inches tall but before the boot stage of development. Use 3 pints in 10 to 20 gallons of water per acre. For best results, apply before weeds reach a height of 5 inches or branches of weeds exceed a length of 5 inches. Avoid cultivation after treatment when sorghum is brittle. Hybrids vary in tolerance to MCPA. Hybrids of Wheatland parentage may be particularly susceptible. Spray only varieties known to be tolerant. Consult seed company or your Agricultural Experiment Station or Extension Service Weed Specialist for guidance.

Do not graze dairy animals on treated areas until seven (7) days after treatment.

Do not graze meat animals on treated areas within seven (7) days of slaughter.

GRASSES GROWN FOR SEED: Use 2 to 4 pints per acre in sufficient water to give adequate coverage. Use 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 been tillered. On new seedling grass apply after grass has 5 leaves. **Do not graze dairy animals on treated areas until seven (7) days after treatment. Do not graze meat animals on treated areas within seven (7) days of slaughter.**

Note: In weed control in grasses repeat treatment may be needed for less susceptible weeds. White clover and other legumes may be temporarily injured or killed. In some areas, dichondra, bent, buffalo, carpet, and St. Augustine grasses may also be injured by the treatment.

ESTABLISHED GRASSLANDS AND PASTURES: Use 2 to 6 pints per acre in sufficient water (10 to 100 gallons) to give thorough coverage. Use higher rate for Canada Thistle and other hard-to-kill weeds. Spray perennials in bud stage and re-growth in fall. Other weeds may be sprayed in spring or fall, when they are actively growing. **Note:** Alfalfa, Alsike, Red, Crimson, Sub clovers are injured by MCPA

ESTABLISHED LAWN AND TURF: Use 2 fluid ounces in 3 to 5 gallons of water. Apply uniformly over 1000 square feet. For larger areas use 2 to 6 pints per acre in 10 to 100 gallons of water. Apply in the spring or fall when weeds are actively growing. Do not mow within two days before or after application.

NON-CROP AREAS: Canada Thistle, White Top, Meadow Buttercup, Field Bindweed (Morning-glory), and Texas Blueweed. For spot treatment use 1/2 pint in 3 to 4 gallons of water, or 1 1/2 gallon of MCPA Sodium Herbicide per acre, and spray to wet weeds thoroughly when in bud to early bloom and again in fall regrowth. Add 1 quart of wetting agent to each 100 gallons of spray solution use for high volume ground application. **NOTE: on fallow land do not plant any crop for 3 months after**

treatment or until chemical has disappeared from soil. Do not forage or graze livestock on treated areas within 7 days of treatment.

**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.

