



United States
Environmental Protection Agency
Washington, DC 20460

 Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-510	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Sodium Salt	PM#	
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 type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<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.

NOTIFICATION
MAR 11 2005

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Other Revisions

Notification of Other Revisions per PR Notice 98-10. This notification is 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.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container	<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product Self Adhesive		<input checked="" type="checkbox"/> Lithograph Paper glued 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 Mandy K. Styles	Title Product Registration Supervisor	Telephone No. (Include Area Code) (901) 752-4420
Certification 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 (Stamp)
2. Signature 	3. Title Product Registration Supervisor	
4. Typed Name Mandy K. Styles	5. Date 3/1/2005	

MCPA SODIUM SALT

MCPA SODIUM SALT HERBICIDE

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

ACTIVE INGREDIENT:

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

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

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.

FIRST AID

IF IN EYES:

- Hold eyelid open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor immediately for treatment advice.

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment advice.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Have a person sip a glass of water if able to swallow.
- Do not give anything to an unconscious or convulsing person.

IF ON SKIN:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water, after the first minutes, then continue rinsing.
- Call a poison control center or doctor immediately for treatment advice.

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.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

SEE INSIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA REG. NO. 5905-510

EPA EST. NO.

NET CONTENTS:

SN:

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

PERSONAL PROTECTIVE EQUIPMENT

Applicators and other handlers must wear:

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

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. 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.

ENGINEERING CONTROLS STATEMENTS

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 clothing immediately if pesticide gets inside. When 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

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.

NOTIFICATION

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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 worker entry into treated areas during the restricted entry interval (REI) of 48 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
- Waterproof 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. Keep children and pets out of treated areas until sprays have dried.

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.

RETURNABLE-REFILLABLE CONTAINER (Drum):

After use, return the container to the point of purchase or designated locations. This container must only be filled with **MCPA Sodium Herbicide**. **DO NOT RE-USE THIS CONTAINER FOR ANY OTHER PURPOSE.** Prior to refilling, inspect thoroughly for damage such as cracks, punctures, abrasions, and damaged or worn out threads on closure devices. Do not refill or transport damaged or leaking containers. Check for leaks after refilling and before transportation. If the container is not being refilled, return to the point of purchase.

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 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.
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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.

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- Using nozzle types and positions which do not produce fine spray droplets.
- Using a spray boom no longer than 3/4 the wing or rotor span of the aircraft.
- 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 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 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
	(goatweed)	
Goatsbeard	Jimsonweed	Kochia
Lambsquarter	Marshelder	Mint (dragonhead)
Mustards	Pennycress	Pepperweed (field)
Puncturevine	Ragweed	Redstem
Shepherdspurse	Sicklepod	Sneezeweed
Stinkweed	Water Plantain	
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		

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

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.

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 tilled. 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 (Morningglory), 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

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, 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.

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

March 1, 2005

U.S. Environmental Protection Agency
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
1801 South Bell Street
Crystal Mall #2, Room 266A
Arlington, VA 22202-4501

RE: Notification to Add Other Revisions

To Whom It May Concern,

Enclosed, you will find Helena Chemical Company's Notification for numerous products. Helena has updated the copyright company name, all trademarks, and registered trademarks from Helena Chemical Company to Helena Holding Company. This has been done on the following products:

- Weed Rhap A-4D 5905-501
- Weed Rhap A4-MCPA Herbicide 5905-502
- Weed Rhap A-6D Herbicide 2,4-D Amine 5905-503
- Weed Rhap LV-4D 5905-505
- Transvaal Weed Rhap LV-4 MCPA Herbicide 5905-506
- Weed Rhap Low Volatile Granular D Herbicide 5905-507
- Weed Rhap LV-6D 5905-508
- MCPA Sodium Salt 5905-510
- Setre Carbaryl 80WP Insecticide 5905-517
- Trifluralin 4EC 5905-519
- Par F 70 Soluble Oil 5905-520
- Trifluralin 60D 5905-521
- Atrazine 90DF 5905-522
- Propanil 60D 5905-523
- Copper Z 6/2 Granular Algicide 5905-524
- Chlorothalonil 90D 5905-527
- Barrage HF 5905-529
- Allityn Insect Repellent 5905-531
- Trifluralin HFP 5905-532
- Pro-Mate Barricade 0.375% Plus Fertilizer 5905-535

This should also be noted on all alternate brand names of the master labels.

In support of these Notifications, you will find the following:

- EPA Form 8570-1
- 1 copy of the revised label highlighted

If you have any questions, do not hesitate to call me at (901) 752-4420 or by fax at (901) 758-1694. Thank you for your assistance in this matter.

Sincerely,

Mandy K. Styles
Product Registration Supervisor