

SEP 21 1998

Frank Miller & Sons, Inc.
c/o Mr. Russell F. Sawyer
Registrations Plus
425 West 194th Street
Glenwood, IL 60425-1584

Dear Mr. Sawyer:

Subject: Label Amendment to Comply with the 2,4-D Exposure Reduction Agreement in
Response to the Agency's Letter, Dated July 7, 1998
Complete Vegetation Killer
EPA Registration Number: 8123-28
Your Submission Received July 27, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided you make the following revisions:

1. Correct the 2,4-D acid equivalency in the footnote to the ingredient statement to read "0.7%".
2. Add the company name and address to the front panel.
3. Revise the beginning of the first paragraph under Hazards To Humans & Domestic Animals to read as follows:

"CAUTION: Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing."

The remainder of the paragraph, beginning with "When mixing, loading, or applying this product, ..." is acceptable.

4. Delete the second paragraph under Hazards To Humans & Domestic Animals ("The maximum number of broadcast applications per treatment site ... Do not enter treatment areas until spray has dried or dust has settled."). These statements are only required for 2,4-D Turf products.

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #8:S546330.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Sep 21, 1998							

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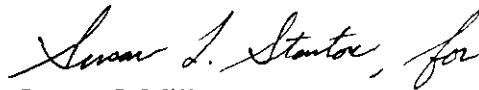
5. Delete the ocular statement of practical treatment (not required for products in TOX category IV for eye irritation potential) and revise the dermal statement of practical treatment to read as follows:

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

6. In the paragraph above the Storage and Disposal instructions, change the first word from "CAUTION" to "PRECAUTION". "Caution" is the product's signal word and may only appear on the front panel and in the Hazards To Humans and Domestic Animals section.

A stamped copy of the label is enclosed for your records. Submit one copy of the final printed labeling before you release the product for shipment.

Sincerely yours,



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

Enclosure

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS &
DOMESTIC ANIMALS
CAUTION: KEEP OUT OF REACH OF
CHILDREN**

Harmful or fatal if swallowed or absorbed through skin. Causes eye irritation. Causes skin irritation. Do not breathe vapors or mist. Do not get in eyes, on skin or on clothing. When mixing, loading, or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves. Wash hands, face and arms with soap and water as soon as possible after mixing, loading, or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower.

The maximum number of broadcast applications per treatment site is 2 per year. Do not allow people (other than applicator) or pets on treatment areas during application. Do not enter treatment areas until spray has dried or dust has settled.

If this container is over one gallon and less than five gallons, the person engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron. If this container is five gallons or more in capacity, then a mechanical system (probe and pump) 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.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not contaminate water when disposing of equipment washwaters. 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. Vapors from this product may injure susceptible plants in the immediate vicinity. Coarse sprays are less likely to drift. 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 a closed system for mixing or transferring this product will reduce the probability of spills. Placement of mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

PHYSICAL OR CHEMICAL HAZARDS

Contains petroleum distillates. Do not use or store near heat or an open flame.

**SCIENTIFICALLY FORMULATED FOR
INDUSTRIAL AND INSTITUTIONAL USE**

BATCH NO.:

**Complete Vegetation
Killer**

ACTIVE INGREDIENTS

Isooctyl: (2-Ethylhexyl ester) of
2,4-Dichlorophenoxyacetic acid, 1.09%
Bromacil (5-Bromo-3-sec-butyl-6-methyluracil) 0.61%
INERT INGREDIENTS 98.30%

Total 100.00%

2,4-Dichlorophenoxyacetic acid equivalent 0.63%
Isomer specific AQAC Method No. 6. DO 1-5.
Contains petroleum distillates, xylene, or xylene range aromatic solvent.

EPA REG. NO. 8123-28-
EPA EST. NO. 8123-L-1

CAUTION

KEEP OUT OF REACH OF CHILDREN
See Side Panel For Further Precautions
And First Aid Instructions.

Exclusively Sold By:

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 21 1998

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
8123-28

Net Contents:

DIRECTIONS FOR USE

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

This product is a specially formulated non-selective vegetation killer for controlling a wide range of annual and perennial weeds and grasses. Apply undiluted as a spray on non-cropland areas where bare ground is desired. Control will vary with the amount of chemical applied, soil type, rainfall and other conditions. This product is noncorrosive to metal surfaces. Especially compounded for industrial and municipal weed control.

GENERAL WEED CONTROL: To control most weeds on non-cropland areas such as parking lots, fence rows, railroad sidings and storage yards, spray at the rate of 1 to 2 gallons for each 1,000 square feet (40 to 80 gallons per acre).

DIRECTIONS: This product may be applied at any time of the year, EXCEPT when ground is frozen. Best results are obtained after vegetation has emerged, in late spring or early summer. Use power sprayers, compressed air hand sprayers, or an ordinary sprinkling can. No dilution or agitation is required.

CAUTION: Vapors from this product may injure susceptible plants, as this product may injure cotton, beans, peas, grapes, ornamentals, etc.

STORAGE AND DISPOSAL

Do not contaminate water, food, feed, or fertilizer by storage or disposal. Keep container tightly closed when not in use. If container is damaged or leaking, contain spill. Soak up spilled material with absorbent and place in closed, labeled container for proper disposal.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or residue is a violation of Federal Law and may contaminate ground water. 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). Then offer for recycling or reconditioning, or puncture and dispose in a sanitary landfill, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**STATEMENT OF PRACTICAL
TREATMENT**

IF SWALLOWED: Call a doctor or get medical attention. Do not induce vomiting. Do not give anything by mouth to an unconscious person. Avoid alcohol. NOTE TO PHYSICIAN: May pose an aspiration pneumonia hazard.

IF ON SKIN: Remove contaminated clothing and launder before reuse. Wash skin with soap and water.

IF IN EYES: Flush eyes and under eyelids with water for at least 15 minutes, and obtain medical attention.

LVK-44 (1/98)

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