FEB 1 2 1998

Mr. William M. Mahlburg Nufarm Americas, Inc. 1009-D West St. Maartens Dr. St. Joseph, MO 64506

Dear Mr. Mahlburg:

SUBJECT:

Label Amendment Deleting Rice and Pea Use Patterns

Technical MCPA IOE

EPA Registration Number: 11685-15 Your Submission, Dated May 12, 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 change:

Revise the acid equivalency statement in the footnote to the ingredient statement as discussed in my August 29, 1997, letter to you. The MCPA acid equivalency should be "59.64%" (or "59.6%" rounded to a single decimal place).

A stamped copy is enclosed for your records. Please 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

RD:STANTON:PM Team 23:Rm. 237:CM-2:305-5218:Disk #7:S523770.LET

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CONCURRENCES								
SYMBOL >	7505C			i .				
SURNAME >	S. Stanton							
DATE +	Feb 12, 1998		,					
EPA Form 1320-1 (12-70)								

FEB 12 1998

RECD EPA/OPP/DPD1



Under the Federal Insecticide, Fundicide, and Rodemicide Act as amended, for the pesticide registered under EPA Reg. No. //685-15

Technical MCPA IOE

FOR MANUFACTURING OF HERBICIDES ONLY

* 2-Methyl-4-chlorophenoxy- acetic acid equivalent 59.5% by AOAC isomer specific method of analysis

KEEP OUT OF REACH OF CHILDREN CAUTION

See Below For Additional Precautionary Statements

EPA REG. NO. 11685-15 EPA EST. NO. 11685-EN-1

NET WEIGHT ____ LBS. (____ KG)

LIQUID MEASURE ___ GALS. (___ L)

EXP04/97

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours A Day: 00 44 (0)181-311-7000

STATEMENT OF PRACTICAL TREATMENT

If swallowed: If patient is conscious and alert, give 2 to 3 glasses of water to drink. Induce vomiting if large amounts are ingested. Get medical attention.

If in eyes: Hold eyelids open and flush with a steady gentle stream of water for 15 minutes. Get medical attention.

If on skin: Wash with plenty of soap and water while removing contaminated clothing and shoes. Wash clothing separately before reuse.

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration. Administer oxygen if necessary. Get medical attention.

Note to physician: No specific antidote is available. All treatments should be based on observed signs and symptoms

of distress in the patient. Overexposure to materials other than this product may have occurred.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

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

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label before using this product.

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food or feed by storage or disposal. Store in a cool dry place.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate 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 of in a sanitary landfill, or by other procedures approved by state and local authorities.

For use only by manufacturers in the formulation of herbicides. Formulators using this product are responsible for

obtaining EPA registration of their formulated products.

Only for formulation into a herbicide for:

- (1) The following uses: Agricultural Crops: wheat, barley, oats, rye, flax. Non-Crop: rangeland, pasture, grasses, turf in areas such as roadsides, golf courses, lawns, fence rows, vacant lots, rights-of-way and other similar non-crop areas.
- (2) Uses for Which USEPA has Accepted the Required Data and/or Citations of Data that the Formulator has Submitted in Support of Registration and
- (3) Uses for Experimental Purposes that are in compliance with USEPA Requirements.

DISCLAIMER AND INDEMNITY FOR FORMULATOR'S USES

THE MANUFACTURER EXPRESSLY DISCLAIMS ALL LIABILITY FOR CLAIMS AND ACTIONS (WHETHER BASED ON CONTRACT, TORT, STRICT LIABILITY OR BREACH OF WARRANTY) ARISING OUT OF, RESULTING FROM OR CONNECTED WITH A FORMULATION CONTAINING THIS PRODUCT WHEN USED FOR ANY PURPOSE OTHER THAN THOSE USES SET FORTH IN (1) ABOVE. THE MANUFACTURER HAS NOT DEVELOPED SCIENTIFIC DATA TO SUPPORT, NOR HAS IT EXPLICITLY OR IMPLICITLY APPROVED, ANY USES OTHER THAN THOSE IN (1) ABOVE.

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LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants that this product conforms to the chemical description on the label; that this product is reasonably fit for the purposes set forth in item (1) of the Directions for Use when it is used in accordance with such Directions; and that the statements under item (1) of the Directions, the warnings and other statements on this label, other than the suggested uses under items (2) and (3) of the Directions, are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and residues on food crops and upon reports of field experience. Tests have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR

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Manufactured by Nufarm UK Limited 1009-D West St. Maartens Dr. St. Joseph, MO 64506

Made in the United Kingdom of Great Britain