

PM 23

MAY 21 1997

11685-19

5-21-97

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

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Dear Mr. Mahlburg:

SUBJECT: Label Amendment: Geographically Limiting Rice Use  
 To California and Pea Use to Pacific Northwest  
 Rhomene MCPA Amine Herbicide  
 EPA File Symbol: 11685-19  
 Your Application Dated May 12, 1997

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. Revise the dermal statement of practical treatment in accordance with Agency recommendations for products, such as this one, which have been classified in Category III for dermal toxicity. The statement should read as follows:

"If on skin: Wash with plenty of soap and water. Get medical attention."

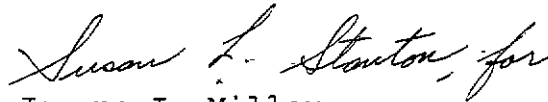
2. Delete the statement "Avoid contact with eyes, skin or clothing" from the first paragraph under "HAZARDS TO HUMANS AND DOMESTIC ANIMALS" and replace it with the following statements:

"Do not get in eyes or on clothing. Avoid contact with skin."

3. Submit one copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



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

Enclosure

RD:STANTON:PM Team 23:Rm. 235:CM-2:305-5218:Disk #5:S523768.LET

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	May 21, 1997							

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

2 of 6

RECD EPA/OPP/DPD1

MAY 21 1997  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
116,85-19



'97 MAY 15 A9:23

# RHOMENE®

## MCPA Amine Herbicide

CONTROLS WEEDS IN FLAX, RICE, PEAS AND SMALL GRAINS

**ACTIVE INGREDIENT:**

2-Methyl-4-chlorophenoxyacetic acid, dimethylamine salt .....	52.1%*
INERT INGREDIENTS: .....	47.9%
TOTAL: .....	100.0%

\*2-Methyl-4-chlorophenoxyacetic acid equivalent 42.6% by weight or 4 pounds per gallon

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.)

See Below For Additional Precautionary Statements

EPA REG. NO. 11685-19  
EPA EST. NO. \_\_\_\_\_

NET CONTENTS \_\_\_ GALS. ( \_\_\_ L)

EXP05/97

For Chemical Emergency, Spill, Leak, Fire, Exposure or Accident, Call CHEMTREC Day or Night 1-800-424-9300

### STATEMENT OF PRACTICAL TREATMENT

- If **swallowed**: If patient is conscious and alert, give 2 to 3 glasses of water to drink. Do not induce vomiting. Get medical attention.
- If **on skin**: Wash skin with plenty of soap and water, if available, while removing contaminated clothing and shoes. Wash clothing separately before reuse.
- If **in eyes**: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention, preferably an ophthalmologist.
- 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. This product is irritating to mucous membranes. If large amounts (greater than 1 ml/kg body weight) of the product have been ingested, the stomach should be evacuated by gastric intubation with the aid of a cuffed endotracheal tube to prevent exposure of the esophagus. After removal of stomach contents, wash stomach by instilling 30 to 50 g of activated charcoal in 3 to 4 ounces of water through the stomach tube and again remove stomach contents. Avoid oily laxatives.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS DANGER

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Avoid breathing vapors or spray mist.

**Personal Protective Equipment (PPE):**

**Applicators and other handlers must wear:** coveralls over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure and protective eye wear. When mixing, loading or repairing and cleaning equipment used with this product, persons must also wear chemical-resistant apron.

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.

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 (personal protective equipment) 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. Then wash thoroughly and put on clean clothing.

### ENVIRONMENTAL HAZARDS

Drift or run-off may adversely affect non-target 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.

Avoid spray drift to susceptible plants such as cotton, beans, tomatoes and ornamentals. Avoid use of small diameter spray nozzles. At high air or ground surface temperatures, vapors from this product may injure susceptible plants.

**Mixing and Loading:** Most cases of ground water 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 ground water 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 ground water contamination.

**Cleaning of Equipment:** Do not use same spray equipment for other purposes unless thoroughly cleaned. 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. Read entire label before using this product.

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 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 over short-sleeved shirt and short pants, waterproof gloves, chemical-resistant footwear plus socks, chemical-resistant headgear for overhead exposure and protective eye wear.

### STORAGE AND DISPOSAL

**STORAGE:** Do not contaminate water, food or feed by storage or disposal. Store in original container in a dry secured storage area. Keep

container tightly closed when not in use. Avoid freezing. If stored below 20° F (-6.6° C), rewarm container and agitate.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. 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: Metal, Non-Returnable:** 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. **Plastic, Non-Returnable:** Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke. **Returnable-Refillable:** After use, return the container to the point of purchase or designated locations. This container must only be refilled with this herbicide. **DO NOT REUSE THE 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. For information on the disposal of unused, unwanted product, contact manufacturer or seller. For information on cleanup of spills, contact manufacturer or CHEMTREC. If the container is not being refilled, return it to the point of purchase.

### GENERAL CAUTIONS AND RESTRICTIONS

Do not apply this product through any type of irrigation system. Do not use in or near a greenhouse.

### COMPATIBILITY

If this product is to be tank mixed with other pesticides, compatibility should be tested prior to mixing. To test for compatibility, use a small container and mix a small amount (0.5 to 1 quart) of spray, combining all ingredients in the same ratio as the anticipated use. If any indications of physical incompatibility develop, do not use this mixture for spraying. Indications of incompatibility usually will appear within 5 to 15 minutes after mixing. Read and follow all directions and precautions on this label and on the labels of any product(s) for which a tank mixture is being considered.

### GENERAL INFORMATION

This product is effective on a large number of broadleaf weeds and is useful for controlling these weeds in certain crops. Several crops, such as flax, rice, oats and small grains underseeded to legumes are more tolerant of MCPA than they are of 2,4-D.

This herbicide is the amine form of MCPA that is easily dissolved in water, even in the hard waters found in some areas. Mix thoroughly while diluting this material and mix again if allowed to stand long before spraying.

To convert locally recommended application rates into amount of this herbicide, use the following table:

Conversion of pounds of MCPA acid to pints of this product						
MCPA acid						
¼ lb.	3/8 lb.	½ lb.	¾ lb.	1 lb.	1½ lb.	1½ lb.
Amount of this product						
½ pt.	3/4 pt.	1 pt.	1½ pt.	2 pt.	2½ pt.	3 pt.

**INJURY TO CROPS MAY OCCUR FROM THIS PESTICIDE. IF YOU ARE NOT PREPARED TO ACCEPT SOME DEGREE OF CROP INJURY, DO NOT USE THIS PRODUCT.**

Crop varieties vary in response to MCPA, and some may be easily injured. Apply this herbicide only to varieties known to be tolerant to MCPA. If you are uncertain concerning tolerant varieties or local use situations that may affect crop tolerance to MCPA, contact your seed company or state Agricultural Extension Service for advice.

**GENERAL WEED LIST**

**WEEDS CONTROLLED BY PROPERLY APPLIED TREATMENTS OF THIS HERBICIDE INCLUDE THE FOLLOWING:**

- |   |                    |
|---|--------------------|
| <i>Amaranthus</i> species<br>(pigweeds) | plantains          |
| common burdock                          | purslanes          |
| common cocklebur                        | ragweed            |
| common lambsquarters                    | (common and giant) |
| dandelion                               | shepherdspurse     |
| field pennycress                        | thistle            |
| mustard                                 | (bull and Russian) |
| (except blue mustard)                   | yellow rocket      |
| pepperweeds                             |                    |
| (except perennial)                      |                    |

**RECOMMENDATIONS FOR APPLYING  
RHOMENE® MCPA AMINE HERBICIDE**

FLAX		
CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
FLAX	1/3 to 1/2 pint	Apply when flax is 2 to 8 inches tall. Do not spray once flax has reached the bud stage. Use at least 8 to 10 gallons of water per acre for ground application and at least 3 to 5 gallons of water per acre for aerial application.

**RESTRICTIONS AND LIMITATIONS FOR USE ON FLAX**

Do not allow livestock animals to forage or graze treated areas within 7 days of slaughter.

CEREAL GRAINS		
CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
<b>WHEAT, BARLEY, OATS and RYE (not underseeded with legumes)</b>		
Annual weeds	½ pint	Apply after grain is in the 4-leaf stage but not forming joints in the stem. <b>Do not spray in the boot to dough stage.</b>
Annual and biennial weeds	1 to 2 pints*	Apply after grain is fully tillered (usually about 4 to 8 inches high, but not forming joints in the stem). <b>Do not apply in the boot to dough stage.</b>
Perennial broadleaf weeds	1½ to 2 pints*	
<b>Emergency control in wheat</b>	3 pints	Apply when weeds are approaching bud stage, but <b>do not spray grain in the boot to dough stage.</b> The 3 pints (1½ lb. acid equivalent) per acre application 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.
Perennial broadleaf weeds		
<b>WHEAT, BARLEY, OATS and RYE (underseeded with legumes)</b>	½ pint	Treat after grain is tillered and in the 4-leaf stage and when legume seedlings are 2 to 3 inches tall. Small grains should form a protective canopy over the legume seedlings. Do not use more than 6 gallons of water per acre; higher volumes may result in injury to legumes. Do not apply to grain underseeded with vetch or sweet clover. <b>Do not spray when grain is in the boot to dough stage.</b>
alfalfa, alsike, red and ladino clovers, trefoil		

\*Use the lower rate if small annual and biennial weeds are the major problem. Use the higher rate if perennial weeds or annual and biennial weeds are present which are in the hard-to-kill categories as determined by local experience. The higher rates increase the risk of grain injury

and should be used only where the weed control problem justifies the risk of grain damage.

**RESTRICTIONS AND LIMITATIONS FOR USE ON CEREAL GRAINS**

A minimum of 10 gallons of water per acre for ground application and 2 gallons of water per acre for aerial application is recommended, unless specific site directions listed above indicate otherwise.

Do not allow livestock to forage or graze treated areas within 7 days of slaughter.

RICE (California Only)		
CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
RICE	1 to 1½ pints	Use only in California. Treat when rice is in the 3 to 4-leaf stage and has well established roots systems, usually 18 to 24 days after planting. Applications made during hot weather or at the higher rate may cause temporary stunting of the rice. For best results, weeds should be exposed at time of application. If retreatment is necessary, usually 35 to 65 days after planting, the total amount per acre of this herbicide applied should not exceed 2½ pints in one season. Use 8 to 10 gallons per acre for aerial application.

**RESTRICTIONS AND LIMITATIONS FOR USE ON RICE**

Do not allow livestock animals to forage or graze treated areas within 7 days of slaughter.

Do not grow crayfish or catfish in treated rice fields.

PEAS (Pacific Northwest Only)		
CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
PEAS	½ to ¾ pint	Use only in the Pacific Northwest. Treat when peas are 4 to 6 inches tall. Do not spray while peas are in blossom. Peas may show slight injury, but they usually recover a few days after treatment. Use the higher rate before buds form on Canada thistle to prevent from going to seed. Do not spray peas that are stressed from lack of moisture or when temperatures are over 90° F. Apply in 15 to 30 gallons of water per acre for ground application and 5 gallons of water per acre for aerial application.

**RESTRICTIONS AND LIMITATIONS FOR USE ON PEAS**

Do not allow livestock to forage or graze treated pea fields.

Do not feed treated vines to livestock.

Do not treat bean type peas (i.e., crowder, blackeye, etc.).

GRASSES GROWN FOR SEED PRODUCTION		
WEEDS IN CROP	AMOUNT OF RHOMENE® PER ACRE	DIRECTIONS
Annual broadleaf weeds	1 to 2 pints	Apply to established stands in the spring before the seed head comes into the boot. <b>Do not spray in boot stage of growth.</b> In seedling grasses apply in the spring after the grass has tillered or has at least 5 leaves but before the boot stage. Use only the low rate on seedling grasses. <b>DO NOT USE IN CALIFORNIA.</b>
Biennial and perennial broadleaf weeds	2 to 3 pints	

**RESTRICTIONS AND LIMITATIONS FOR USE ON GRASSES FOR SEED PRODUCTION**

Do not graze dairy animals or cut forage for hay within 21 days of application.

**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 the directions for use when it is used in accordance with such directions; and that the directions, warnings and other statements on this label are based upon responsible experts' evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of 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 IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR

OTHERWISE SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

**NOTICE TO BUYER**

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

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

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