

DEC 21 1993

Richard J. Otten
A. H. Marks and Company Ltd.
5116 Wood Valley Drive
Raleigh, NC 27613

Dear Mr. Otten:

Subject: Revised Labeling and Correction for Confidential
Statement of Formula
Technical MCPA Acid
EPA Registration No. 15440-7
Your Submission Dated September 17, 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 provisions:

- 1) Delete the words "maximum" and "minimum" from the Ingredients statement. With the addition of certified limits on the Confidential Statement of Formula, these statements are no longer needed on the label.
- 2) Within the Statement of Practical Treatment, rewrite the sentence "Do not give anything to an unconscious person" to read "Do not give anything by mouth to an unconscious person."
- 3) Add the phrase "by burning" to the end of the second sentence in the Container Disposal statement.

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above changes, before releasing the product for shipment.

We acknowledge the correction of the amount of "other unidentified impurities" in the correction page for page #2 of the basic formulation for your Confidential Statement of Formula. This page has been substituted into the Confidential Statement of Formula dated April 27, 1993 and placed in your file as part of the record.

Sincerely yours,

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

Enclosure

CONCURRENCES

SYMBOL	7505C						
SURNAME	D. KENNY						
DATE	12/21/93						

TECHNICAL MCPA ACID

FOR USE ONLY IN FORMULATING HERBICIDES

Formulators using this technical material are responsible for obtaining EPA registration of their end-use products.

NOT FOR RESALE

Keep Out of Reach of Children

CAUTION

See side panel for additional
precautionary statements and
Statement of Practical Treatment

ACTIVE INGREDIENT:

2-methyl-4-chlorophenoxyacetic acid..... 95.0% minimum

INERT INGREDIENTS:..... 5.0% maximum

TOTAL - 100.0%

NET WEIGHT 55 POUNDS
NET WEIGHT 25 KILOS

Produced by:
A.H. MARKS & COMPANY, LTD.
West Yorkshire, England
EPA Reg. No. 15440-7
EPA Est. No. 15440-EN-1

ACCEPTED
with COMMENTS
In EPA Letter Dated
21 DEC 1993
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
15440-7

It is a violation of federal law to use this product in a manner inconsistent with the labeling.

DIRECTIONS FOR USE

Only for formulation into a herbicide for: (1) uses on small grains (including legumes) which include barley, oats, rye, and wheat; (2) uses on legumes (which include alfalfa, clover, lespedeza, trefoil, and pasture grasses); and on golf course or domestic athletic turf. (2) uses for which USEPA has accepted data that the formulator has submitted in support of experimental purposes that are in compliance with the labeling.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Irritation if swallowed. Do not breathe dust or gel into eyes. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT: In case of ingestion, immediately by giving two glasses of water and place in hospital. Get medical attention. Do not give anything to an unconscious person. In case of skin contact, wash skin with plenty of soap and water for 15 minutes and get medical attention.

ENVIRONMENTAL HAZARDS: Do not discharge or spill into lakes, streams, ponds, estuaries, oceans or waterways. If discharge into waterways, requirements of a National Pollutant Discharge Elimination Act permit. If the permitting authority has been notified in writing prior to discharge, the effluent containing this product to sewer systems or sewage treatment plant authority. For guidance, contact the Regional Office of the Environmental Protection Agency.

STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food, or feed. Thorough cleaning of equipment. Open burning and dumping of contents into the environment.

STORAGE: Store in original container separate from food, feed, and fertilizer.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Do not reuse. Pesticide, spray mixture or rinsate is a violation of Federal law. It must be disposed of by use according to label instructions. Contact the Environmental Control Agency or the Hazardous Waste Management and Emergency Response (HWEM) EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty bag into a sanitary landfill or by incineration, if allowed by local authorities. If burned, stay out of smoke.