



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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A. H. Marks & Company, Ltd.
Wyke Bradford
West Yorkshire
England BD129EJ

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

AUG - 4 1997

Subject: Technical 2-Ethylhexyl Ester of MCPA
EPA Registration No. 15440-9
Technical 2-EH Ester of MCPA
EPA Registration No. 15440-22
Applications Dated June 10, 1997 and Letter Dated
June 11, 1997, Request To Change the Chemical
Expression of the Active Ingredients in Subject
Pesticide Products; Submission of Revised Confidential
Statements of Formula (CSFs) and Revised and Updated
Labeling of These Pesticide Products

The proposed basic Confidential Statements of Formula (CSFs), submitted on EPA Form 8570-4 and dated July 30, 1997, have been reviewed and found acceptable as amendments to the subject pesticide product registrations under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended. Each revised CSF has been added to its respective EPA record. Both Formula were found to be in compliance with PR Notice 91-2.

The proposed labeling revisions have been reviewed and found to be acceptable as amendments to the registration of the subject pesticide product under FIFRA, provided that you:

1. Clarify "small grains" under the first listing of use-sites, and as stated: "... small grains but underseeded with legumes (which include alfalfa, clover, lespedeza, trefoil, and vetch)". Revise the claims to read "and" rather than "or"; e.g., "on golf course or domestic lawns" to read "on golf courses and domestic lawns". Replace the word "but" with the word "that".
2. Submit one (1) copy for the final revised printed labeling before you release the product for shipment under the revised label (Note required changes indicated above).

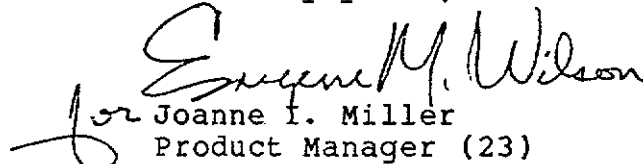
If these conditions are not complied with, registrations

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of these pesticide products will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment of the product under these labels constitutes acceptance of these conditions.

Stamped copies of these labels are enclosed for your records.

Sincerely yours,


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

Enclosure (2)

**MARKS
TECHNICAL 2-ETHYLHEXYL
ESTER OF MCPA**

(4-chloro-2-methyl phenoxy) acetic acid-2-ethylhexyl ester
**FOR USE ONLY IN FORMULATION
OF HERBICIDES**

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

Keep Out of Reach of Children

CAUTION

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

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

AUG - 4 1997

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

15440-9

ACTIVE INGREDIENT:

2-Ethylhexyl ester of 2-(4-chloro-2-methyl phenoxy) acetic acid*..... 97.0%

INERT INGREDIENTS:..... 3.0%

TOTAL - 100.0%

*MCPA Acid Equivalent by weight..... 61.0%

NET CONTENTS _____

Produced by:
A.H. MARKS & COMPANY, LTD.
West Yorkshire, England
EPA Reg. No. 15440-9
EPA Est. No. 15440-EN-1

46.000

06.25.97

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

DIRECTIONS FOR USE

Only for formulation into a herbicide for: (1) uses on small grains (not underseeded with legumes) which include barley, oats, rye, and wheat; small grains but underseeded with legumes (which include alfalfa, clover, lespedeza, trefoil, and vetch); rangeland grasses and pasture grasses; and on golf course or domestic lawns, commercial, industrial or athletic turf. (2) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION - Harmful if swallowed. Do not ingest liquid. Do not get into eyes, on skin or clothing. Wash thoroughly after handling.

STATEMENT OF PRACTICAL TREATMENT:

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

If swallowed: Call a doctor or get medical attention. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

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

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth to mouth. Get medical attention.

ENVIRONMENTAL HAZARDS: Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or 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 sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

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STORAGE AND DISPOSAL

PROHIBITIONS: Do not contaminate water, food or feed by storage, disposal/cleaning of equipment. Open burning and dumping is prohibited. Do not reuse empty container.

STORAGE: Store in original container separate from other pesticides, fertilizers, food and feed.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an appropriate waste disposal facility. Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. 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: Completely empty drum and triple rinse. Offer for recycling, or reconditioning or dispose in a sanitary landfill or by other State and local procedures.