MAY 10 2001

Richard J. Otten A.H. Marks & Company Limited 7474 Creedmoor Road Raleigh, NC 27613

Dear Mr. Otten:

SUBJECT: Label Amendment - Adding Flax To Label

EPA Registration Nos. 15440-9 and 15440-22 Your Submissions Dated February 12, 2001

The labels referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable. The amended labels supersede all previously accepted labels. A stamped copy of the labeling is enclosed for your records. Please submit one copy of the final printed label before you release the product for shipment.

Sincerely yours,

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

Enclosures

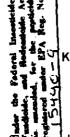
M. Coake

Technical 2-Ethylhexyl Ester of MCPA

(4-chloro-2-methyl phenoxy) acetic acid-2-ethylhexyl ester

FOR LSE ONLY IN FORMULATING HERBICIDES

Formulators using their material are responsible for obtaining EPA is gistration of their end use products.



Keep out of reach of children

CAUTION

Security Panel for additional precautionary statements and Statement of Practical Treatment

ACTIVE INGREDIENT

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

INERT INGREDIENTS

TOTAL

3.0% 100.0%

97.0%

*MCPA Acid Equivalent by weight: 61%

Produced by:

A H Marks and Company Limited Wyke, Bradford

West Yorkshire BD12 9EJ England

Telephone (0)1274 691234 Telefax (0)1274 691176

(International code +44)

Net Contents 55 GALLONS

EPA Reg No.15440-9

EPA Est No 15440-GBR-1

PRECAUTIONARY STATEMENTS

Hazar is to humans and domestic animals

CAUTION- Harmful if swallowed. Do not ingest liquid. Do not get into eyes, on skin or on clothing. Wash thoroughly after handling.

discharge effluent containing this product into 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.

FIRS1' AID

If in Eves

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for reatment advice

If Swallowed

- Call a poison control center or doctor immediately for treatment advice
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If Inhaled

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth, if possible.
- Call ε poison control center or doctor for further treatment advice

If on Skin or Clothing

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes
- Call a poison control center or doctor for treatment advice.

Note to Physician

Probable mucosal damage may contraindicate the use of gastric layage

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 Pollutent Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not

DIRECTIONS FOR USE

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

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

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 re-use 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 frixture 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 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.