



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 3, 2020

Dazhi Mao, Ph.D.  
Regulatory Scientist  
Nufarm Limited  
c/o Nufarm Americas, Inc.  
4020 Aerial Center Parkway  
Morrisville, NC 27560

Subject: Label Amendment – Revised Directions for Use  
Product Name: MARKS DB TECHNICAL ACID  
EPA Registration Number: 15440-20  
Application Date: March 20, 2018  
Decision Number: 540205

Dear Dr. Mao

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Kable Bo Davis by phone at 703-306-0415, or via email at [davis.kable@epa.gov](mailto:davis.kable@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Ondish', followed by the word 'for' written in a cursive style.

Mindy Ondish  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# MARKS DB TECHNICAL ACID

4-(2,4-dichlorophenoxy)butyric acid

FOR MANUFACTURING USE ONLY

**ACTIVE INGREDIENT:**

4-(2,4-dichlorophenoxy)butyric acid..... 97.0%

**OTHER INGREDIENTS:** ..... 3.0%

**TOTAL:** ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

Corrosive to eyes and skin; wear goggles or face shield and rubber gloves when handling.

**SEE BELOW FOR FIRST AID AND ADDITIONAL PRECAUTIONARY STATEMENTS**

**For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300**

**For Medical Emergencies Only, Call (877) 325-1840**

**ACCEPTED**

08/03/2020

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 15440-20

EPA REG. NO. 15440-20

EPA EST. NO. \_\_\_\_\_

NET WEIGHT: \_\_\_\_ LBS (\_\_\_\_ KG)

Manufactured For  
NUFARM LIMITED  
4020 Aerial Center Parkway  
Morrisville, NC 27560



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly after handling.

<b>FIRST AID</b>	
<b>IF SWALLOWED</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>IF ON SKIN OR CLOTHING</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF IN EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>IF INHALED</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.	
<b>NOTE TO PHYSICIAN</b>	
Probable mucosal damage may contraindicate the use of gastric lavage.	

**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 local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the Environmental Protection Agency.

## **DIRECTIONS FOR USE**

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

Only for formulation into an herbicide for the following uses: 1) AGRICULTURAL CROPS: soybeans, peanuts, alfalfa, trefoil, and other legume forages; NON-CROP: Conservation Reserve Program (CRP) areas; and 2) uses for which the US EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store only 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. Pesticides 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 according to label instructions, contact your State Pesticide or Environmental Control Agency or Hazardous Waste representative at the nearest US EPA Regional Office for guidance.

### CONTAINER DISPOSAL:

**[Bags:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into manufacturing equipment. Offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

**[Fiber drums:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping both sides and bottom to loosen clinging particles. Empty residue into manufacturing equipment. Then offer fiber drum and liner for recycling, if available. ]

**[Plastic Drums:** Nonrefillable Container. Do not reuse or refill this container. Triple rinse or pressure rinse container (or equivalent) promptly after emptying. Then offer for recycling, if available, or puncture and dispose of in an approved sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Triple rinse as follows:** Empty the remaining contents into manufacturing equipment. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into manufacturing equipment, or store rinsate for later use or disposal. Repeat this procedure two more times.

**Pressure rinse as follows:** Empty the remaining contents into manufacturing equipment and drain for 10 seconds after the flow begins to drip. Hold container upside down over manufacturing equipment, or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.]

## **WARRANTY DISCLAIMER AND LIMITATION OF LIABILITY**

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV031918)

## LABEL HISTORY

File Name	Revision Mark	Comment
015440-00020.20140203.DRAFT	RV020314	Added Chemtrec # & medical hotline#. Revised Hotline # in F/A box, Revised Container Disposal Statement, added Warranty Statement
015440-00020.20140214.MASTER	RV021414	EPA Approval
051440-00020.20180319.DRAFT	RV031918	REVISED DRAFT