



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

APR 17 2003

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

A.H. Marks and Co. Ltd.
c/o Richard J Otten
7474 Creedmoor Road
Raleigh, NC 27613

Dear Mr. Otten:

Subject: Revised Basic Formula and Labeling
Technical 2-EH Ester of MCPA
EPA Registration No. 15440-22
Your Submission Dated November 12, 2002

The amendment 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. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- Modify the Ingredient Statement to specify "Other Ingredients".

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

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

The revised basic formula dated November 12, 2002 is acceptable and has been included in the files for this product. The amended CSF and labeling supersede all previously accepted ones. For your information, enclosed is a copy of the scientific review. If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Joanne I. Miller".

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

Enclosure

Technical 2-EH Ester of MCPA

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

FOR USE ONLY IN FORMULATING HERBICIDES

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

ACTIVE INGREDIENT

2-Ethylhexyl ester of 2-(4-chloro-2-methyl phenoxy) acetic acid* 97.5%

INERT INGREDIENTS

2.5%

TOTAL

100.0%

* MCPA Acid Equivalent by weight: 61%

Keep out of reach of children

CAUTION

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

Net Contents 55 GALLONS

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)

EPA Reg No. 15440-22

EPA Est No. 15440-GBR-1

**ACCEPTED
 with COMMENTS
 In EPA Letter Dated:
 APR 17 2003**

PRECAUTIONARY STATEMENTS

Hazards 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.

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 15440-22

FIRST AID

If in Eyes
 - 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 treatment 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 a 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 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

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 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 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.