

PM 23

34704-124

1 of 6 file



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

APR 1 1994

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**WILLIAM M. MAHLBURG**  
**AGENT FOR: PLATTE CHEMICAL COMPANY**  
**P.O. BOX 667**  
**GREELEY, CO. 80632**

**Subject: Label Amendment Submission of 11/01/93 Response to PR Notice 93-7**  
**EPA Reg. No. 34704-124**  
**CLEAN CROP LOW VOL 4 ESTER WEED KILLER**

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

**WHAT THIS ACCEPTANCE MEANS:**

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

**WHAT YOU NEED TO DO NEXT:**

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- **BEFORE** selling or distributing any product bearing the final printed labeling
- AND**
- **WITHIN** one year from date of this acceptance.



**Recycled/Recyclable**  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

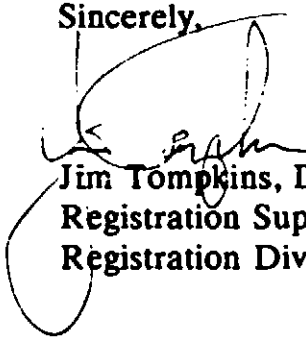
Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs (7505C)  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)  
Office of Pesticide Programs  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

Sincerely,



Jim Tompkins, Deputy Chief  
Registration Support Branch  
Registration Division (7505W)

Attachment

3-76

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Registration Division

William M. Mahlburg  
WILLIAM M. MAHLBURG  
AGENT FOR: PLATTE CHEMICAL CO., INC.  
- BOX 667  
GREELEY CO 80632

Comment for: EPA Reg Nr.34704-124  
CLEAN CROP LOW VOL 4 ESTER WEED KILLER

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

User Safety Recommendations must either be placed in a box or printed on the label in a contrasting color from surrounding text.

Remove the statement "Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

The circled and asterisked statement(s) in the Non-Agricultural Use Requirements box does not belong. Delete the sentence(s) from the Non-Agricultural Use Requirements box and place it where it appeared in your original labeling. If there are no remaining requirements in the box after you delete the sentence(s), delete the entire Non-Agricultural Use Requirements box.

4 of 6

PROPOSED LABEL with COMMENTS In EPA Letter Dated APR 11 1994



# LOW VOL 4 ESTER WEED KILLER

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 34704-124

Low volatile emulsifiable formulation for control of broadleaf weeds in corn, wheat, barley, rye, oats, sorghum, and non-crop areas.

<b>ACTIVE INGREDIENT:</b>	
Isocetyl (2-ethylhexyl) ester of 2,4-Dichlorophenoxyacetic acid .....	65.5%*
<b>INERT INGREDIENTS:</b> .....	34.5%
<b>TOTAL</b> 100.0%	

\* Isomer specific by AOAC Method No. 6.275-6.279 (13th Ed.)  
\* Equivalent to 43.4% 2,4-D acid or 3.8 pounds per gallon.

### USER SAFETY RECOMMENDATIONS

Use only in accordance with the label directions. Do not use in areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Groundwater Contamination: Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.

## KEEP OUT OF REACH OF CHILDREN CAUTION

(See Below For Additional Precautionary Statements)

EPA REG. NO. 34704-124  
EPA EST. NO. 2737-KS-1 (Lot No. begins 10)  
EPA EST. NO. 37507-MT-1 (Lot No. begins 04)  
EPA EST. NO. 40706-ND-2 (Lot No. begins 35)  
NET CONTENTS 2 1/2 GALLONS (9.46 L)

3491 WPSEX008P93

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if swallowed.  
Avoid breathing vapors or spray mist.  
Avoid contact with skin, eyes or clothing. In case of contact immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists.

**Personal Protective Equipment**  
Some materials that are chemically resistant to this product are listed below. If you want more details, follow the instructions for category E of the EPA chemical resistance category selection chart. Applicators and other handlers must wear long-sleeved shirt and long pants, chemical-resistant gloves such as butyl or laminate in the rubber neoprene or Viton, shoes plus socks and protective eyewear. Follow manufacturer's instructions for cleaning and maintaining PPE. Do not use such instructions for washables. Use detergent and hot water. Keep and wash PPE separately from other laundry. After each day of use, cleaning or PPE must not be reused until it has been cleaned.  
For containers over 1 gallon and less than 5 gallons in capacity: Mixes and pumps used to transfer a mechanical system (probe and pump) to transfer the contents of this container must be covered with a chemical-resistant material in addition to the required PPE.  
**Engineering controls statements**  
When handling this pesticide, the employer must know that meeting the requirements for the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240-170.246) in the handling of PPE requirements may be reduced or modified as specified in the WPS.  
For containers of 5 gallons or more in capacity: A mechanical system (probe and pump) must be used for transferring the contents of the container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal. The mechanical system is used in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240-170.246); the handling of PPE requirements may be reduced or modified as specified in the WPS.

### ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.  
**Groundwater Contamination:**  
Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing or transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.  
Do not contaminate irrigation ditches or water used for domestic purposes. Use care to avoid spray contact or drift to 2,4-D susceptible plants such as cotton, tomatoes, flowers, grapes, fruit trees and ornamentals. Do not permit spray mist containing LOW VOL 4 to drift on them, since even very small quantities of the spray, which may be not visible, can cause severe injury during both growing and dormant periods. Do not spray when the wind is blowing towards susceptible crops or ornamental plants. Use coarse sprays to minimize drift. With ground equipment spray drift can be lessened by keeping the spray boom as low as possible; by applying 20 gallons or more of spray per acre; by using no more than 20 pounds spraying pressure with flat fan or flooding flat fan nozzle tips; by spraying when wind velocity is low; and by stopping all spraying when wind exceeds 6 to 7 miles per hour. Do not apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray. With aircraft application, apply 1 to 5 gallons of spray per acre; by using no more than 20 pounds pressure at the nozzles; by using nozzles which produce a coarse spray pattern, and by spraying only when the wind velocity is less than 5 miles per hour. Although this product is much less volatile than butyl or isopropyl esters, at high temperatures (above 95°F.) vapors from this product may injure susceptible plants growing nearby. Do not use in a greenhouse. Flush sprayer out on suitable non-crop area after use. Do not use the same spray equipment for applying other materials to 2,4-D susceptible crops as injury may result.

### PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

### DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.  
For any requirements specified to your State or to be consulted the agency responsible for pesticide regulation.

# BEST AVAILABLE COPY

**LOW VOL 4 ESTER WEED KILLER**  
EPA REG. NO. 34704-124

5 of 6

**AGRICULTURAL USE REQUIREMENTS**

Use this product only in accordance with the following requirements:

1. Read and follow the directions on the label carefully. Do not use this product in any manner not specifically directed on the label.

2. Do not use this product on any crop, plant, or animal which is listed on the label as being susceptible to injury from this product.

3. Do not use this product on any crop, plant, or animal which is listed on the label as being resistant to injury from this product.

4. Do not use this product on any crop, plant, or animal which is listed on the label as being tolerant to injury from this product.

5. Do not use this product on any crop, plant, or animal which is listed on the label as being sensitive to injury from this product.

6. Do not use this product on any crop, plant, or animal which is listed on the label as being highly sensitive to injury from this product.

7. Do not use this product on any crop, plant, or animal which is listed on the label as being extremely sensitive to injury from this product.

8. Do not use this product on any crop, plant, or animal which is listed on the label as being very sensitive to injury from this product.

9. Do not use this product on any crop, plant, or animal which is listed on the label as being moderately sensitive to injury from this product.

10. Do not use this product on any crop, plant, or animal which is listed on the label as being slightly sensitive to injury from this product.

11. Do not use this product on any crop, plant, or animal which is listed on the label as being not sensitive to injury from this product.

12. Do not use this product on any crop, plant, or animal which is listed on the label as being not susceptible to injury from this product.

13. Do not use this product on any crop, plant, or animal which is listed on the label as being not resistant to injury from this product.

14. Do not use this product on any crop, plant, or animal which is listed on the label as being not tolerant to injury from this product.

15. Do not use this product on any crop, plant, or animal which is listed on the label as being not sensitive to injury from this product.

16. Do not use this product on any crop, plant, or animal which is listed on the label as being not highly sensitive to injury from this product.

17. Do not use this product on any crop, plant, or animal which is listed on the label as being not very sensitive to injury from this product.

18. Do not use this product on any crop, plant, or animal which is listed on the label as being not moderately sensitive to injury from this product.

19. Do not use this product on any crop, plant, or animal which is listed on the label as being not slightly sensitive to injury from this product.

20. Do not use this product on any crop, plant, or animal which is listed on the label as being not not sensitive to injury from this product.

**STORAGE AND DISPOSAL**

**PROHIBITIONS:** Do not contaminate water, food, or feed by storage or disposal. Do not store under conditions which might adversely affect the container or its ability to function properly.

**STORAGE:** Do not store below temperature of 0°F. If frozen, warm to 45°F. and redissolve before using by rolling or shaking the container. Store in safe manner. Store in original container only. Keep container tightly closed when not in use. Reduce stacking height where local conditions can affect package strength. Personnel should use clothing and equipment consistent with good pesticide handling.

**PESTICIDE DISPOSAL:** Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate, is a violation of Federal Law and may contaminate groundwater. 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:** Metal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Plastic: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, burning. If burned, stay out of smoke.

**GENERAL INFORMATION**

LOW VOL 4 is recommended for control of numerous broadleaf weeds and certain 2,4-D susceptible woody plants without injury to most established grasses. Species controlled include the following, plus many others:

beggarticks	jimsonweed	sand shinneryoak
bitterweed	lambequarter	shepherdspurse
blueweed, Texas	loco, bigbend	sicklepod
broomweed	mallow, Venice	smartweed
buckbrush	manzanita	sneezeweed, bitter
burdock	marshelder	somestickle, annual
burhead	milkvetch	spangle/needles
carpetweed	morningglory, annual	sumac
catnip	mustards	sunflower
chamise	nettle	sweetclover
chicory	onion, wild	tansymustard
cocklebur	penncress	tansyragwort
coffeseed	pepperweed, field	thistle, bull
cornflower	pigweed	thistle, musk
coyote brush	plantain	thistle, Russian
croton	poorjoe	tumbleweed
dandelion	rabbitbrush	velvetleaf
dock	radish, wild	vervain
dogfennel	ragweed	vetch
elderberry	rape, wild	weevil plantain
farweed	redstem	wilow
galinoga	sage, coastal	witchweed
garlic, wild	sagebrush, big	wormwood
goatsbeard	sagebrush, sand	yellow rocket
hemp, wild	salsify	yellow starthistle
jewelweed		

**NOTE:** Local conditions, crop varieties and application regulations vary and may affect use of this herbicide. Consult local agricultural experiment station or extension service weed specialists and state regulatory agencies for recommendations in your area. Aerial applications may be of use for control of weeds on certain crops where there would be no danger of drift to susceptible crops. Applications should only be made by applicators experienced in the use of 2,4-D

formulations. Regulations governing aerial application of herbicides are in effect in many states. Consult local regulatory agencies concerning requirements before making applications.

Do not apply this product through any type of irrigation system.

**Treating Small Areas:** Two tablespoonfuls of LOW VOL 4 in 1 1/2 gallons of water is about equal to 1 1/2 quarts in 100 gallons.

**TO PREPARE THE SPRAY:** (1) Fill the spray tank about half full with water, then add the required amount of LOW VOL 4 with agitation, and finally the rest of the water. **NOTE:** LOW VOL 4 in water forms an emulsion which tends to separate unless the mixture is kept agitated. (2) If oil is added, first mix the LOW VOL 4 and the oil and then add this mixture to the water. However, with adequate agitation, the oil can be added after the LOW VOL 4 is mixed in the water. (3) If straight oil is used, a solution is formed and separation does not occur. Do not allow any water to get into the oil-herbicide mixture to avoid formation of an invert emulsion.

**TIME OF APPLICATION:** Best results are obtained when LOW VOL 4 is used on young weeds that are actively growing. Applications of lower recommended rates to susceptible annual weeds usually will be satisfactory, but for perennial weeds and other conditions, such as in very dry areas where kill is difficult, use higher recommended rates. When used as a selective spray on crops, the stage of growth of the crop must be considered. Some woody plants and weeds are hard to kill and repeat applications may be necessary.

**SMALL GRAINS:**  
**Spring Wheat and Barley:** Apply 1/2 to 1 pint per acre. Spray when grain is in full tiller stage (usually 4 to 8 inches tall) but before the boot stage and when weeds are small. Do not apply before the tiller stage nor from early boot to the dough stage. Higher rates, up to 2 pints per acre, may be needed to handle difficult weed problems in certain areas such as under dry conditions especially in western areas. However, do not use unless possible crop injury will be acceptable.

**Winter Wheat and Rye:** Apply 1/2 to 1 pint per acre in the spring at full tiller stage but before the early boot stage.

**Spring Seeded Oats:** Apply 1/2 pint per acre at the full tiller stage but before the early boot stage. Oats are less tolerant to 2,4-D than wheat or barley and are more likely to suffer some injury.

**Fall Seeded Oats (Southern) Grown for Grain:** Apply 3/4 to 1 1/2 pints per acre after full tillering but before the early boot stage. Some difficult weeds may require higher rates for maximum control but crop injury may result. Do not spray during or immediately following cold weather.

**NOTE:** Do not permit dairy animals or meat animals being finished for slaughter to forage or graze treated grain fields within 2 weeks after treatment.

**Preharvest Treatment:** Apply 1 to 2 pints per acre when grains are in the hard dough stage to control large weeds that may interfere with harvest. Best results will be obtained when soil moisture is sufficient to cause succulent weed growth. **NOTE:** Do not feed treated straw to livestock.

**CORN: Preemergence -** Use LOW VOL 4 in sufficient water for uniform coverage. Best results are obtained when applied 3 to 5 days after planting, but before corn emerges. Do not apply to light, sandy soils.

**Postemergence -** Apply LOW VOL 4 from emergence to tasseling. When spraying corn above 10 inches in height, use nozzle extensions ("corn drops"), directing the spray at base of the corn plant to keep the spray off the leaves as much as possible. Do Not apply from tassel emergence to dough stage. Crop injury is more likely to occur if corn is growing rapidly under high temperature and high soil moisture conditions. Under such conditions, use the lowest recommended rates. Delay cultivation for 8 to 10 days after application to reduce stalk breakage resulting from temporary brittleness caused by 2,4-D. Hybrids vary in tolerance to 2,4-D. Consult local agricultural experiment station or extension service weed specialists regarding the use of 2,4-D on your specific hybrid. See chart for recommended rates.

Crop (See Directions Above)	Amount of LOW VOL 4 Per Acre	
	For Average Conditions	For Dry Conditions as in Western States*
Corn**		
Preemergence	2 to 4 pints	
Postemergence	1/2 pint	1/2 to 3/4 pint

\* Arizona, Idaho, Montana, Nevada, Oregon, Utah, Washington, Wyoming, Kansas, Colorado & Western Nebraska.

\*\* If only rows or bands are treated, leaving middles unsprayed, reduce dosage rate per crop acre proportionate to the ground area actually sprayed.

**SORGHUM (MILO):** Apply 1/2 pint per acre when sorghum is 5 to 15 inches tall. A higher rate of 3/4 to 1 pint per acre may be needed to control some weeds but the chance for crop injury is likewise increased. Do not use with oil. Do not treat before the sorghum is 5 inches tall nor during the boot, flowering or early dough stages. If sorghum is taller than 8 inches, use drop nozzles to keep the spray off the foliage as much as possible. Temporary crop injury may occur under conditions of high soil moisture and high air temperatures. Varieties vary in tolerance to 2,4-D and some hybrids are quite sensitive. Spray only varieties known to be tolerant to 2,4-D. Contact seed company and Extension Service authorities for this information.

