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34704-125

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

APR 1, 1994

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Label Amendment Submission of 11/01/93 Response to PR Notice 93-7  
EPA Reg. No. 34704-125  
CLEAN CROP LOW VOL 6 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

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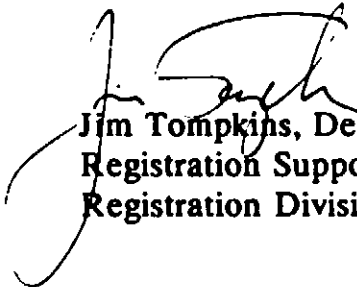
**Submit the final printed labeling via the U.S. Postal Service to:**

**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**

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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.34704-125  
CLEAN CROP LOW VOL 6 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.

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PROPOSED LABEL

ACCEPTED with COMMENTS in EPA Letter Dated

APR 1 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act amended, for pesticide labeled under EPA Reg. No. 34704-125



# LOW VOL 6 ESTER WEED KILLER

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

**ACTIVE INGREDIENT:**  
Isocetyl (2-ethoxyethyl) ester of 2,4-Dichlorophenoxyacetic acid ..... 88.8%\*

**INERT INGREDIENTS:** ..... 11.2%

TOTAL 100.0%

\* Isomer specific by AOAC Method No. 6.275-6.279 (13th Ed.)  
\* Equivalent to 58.9% 2,4-D acid or 5.6 pounds per gallon.

## KEEP OUT OF REACH OF CHILDREN CAUTION

(See Below For Additional Precautionary Statements)

- EPA REG. NO. 34704-125
- EPA EST. NO. 2737-KS-1 (Lot No. begins 10)
- EPA EST. NO. 37507-MT-1 (Lot No. begins 04)
- EPA EST. NO. 40708-ND-2 (Lot No. begins 35)

NET CONTENTS 2 1/2 GALLONS (9.46 L)

3482

WP5ECP08P93

## 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**  
Applicators and other handlers must wear long-sleeved shirt and long pants, socks and shoes, and a protective covering for hands and feet. Wash thoroughly after each use. Do not eat, drink, or use tobacco while handling this product. Do not use equipment and mixtures containing this product in enclosed areas. Do not use in areas where food is stored, prepared, or consumed. Do not use in areas where people or animals are present.

**For containers over 1 gallon and less than 5 gallons in capacity**  
Mixtures containing this product shall be stored in a secure container. Do not store in areas where people or animals are present. Do not use in areas where food is stored, prepared, or consumed. Do not use in areas where people or animals are present.

**For containers of 5 gallons or more in capacity**  
Mixtures containing this product shall be stored in a secure container. Do not store in areas where people or animals are present. Do not use in areas where food is stored, prepared, or consumed. Do not use in areas where people or animals are present.

### USER SAFETY RECOMMENDATIONS

Users should wash hands thoroughly after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change and launder clothing.

### 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 6 to drift onto them, since even very small quantities of the spray, which may not be 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 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.

### DIRECTIONS FOR USE

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

Do not use in areas where food is stored, prepared, or consumed. Do not use in areas where people or animals are present.

### AGRICULTURAL USE REQUIREMENTS

Use only in accordance with the label directions. Do not apply 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. Do not use in areas where food is stored, prepared, or consumed. Do not use in areas where people or animals are present. Do not use in areas where people or animals are present.

# BEST AVAILABLE COPY

**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, by burning. If burned, stay out of smoke.

**GENERAL INFORMATION**

LOW VOL 6 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	Galinsoga	Plantains	Spanishneedles
Bitlweed	Garlic, wild	Porroje	Sumac
Blueweed, Texas	Goatsbeard	Rabbitbrush	Sunflower
Broomweed	Hemp, wild	Radish, wild	Sweetclover
Buckbrush	Jewelweed	Ragweed	Tansymustard
Burdock	Jimsonweed	Rapa, wild	Tansyragwort
Burhead	Lambequarter	Redstem	Thistle, bull
Carpetweed	Loco, bigbend	Sage, coastal	Thistle, musk
Catnip	Mallow, Venice	Sagebrush, big	Thistle, Russian
Chamise	Manzanita	Sagebrush, sand	Turnbleweed
Chicory	Marshelder	Salsify	Velvetleaf
Cocklebur	Milkvetch	Sand shiner-oak	Vervains
Coffeeweed	Morning-glory, annual	Shepherdspurse	Velch
Cornflower	Mustards	Sicklepod	Water plantain
Coyote brush	Nettles	Smartweed	Willow
Croton	Onion, wild	Sneezeweed, bitter	Witchweed
Dandelion	Pennycress	Sowthistle, annual	Wormwood
Docks	Pepperweed, field		Yellow rocket
Dogfennel	Pigweed		Yellow starthistle
Elderberry			
Fanweed			

**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 application 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:** One tablespoonful of LOW VOL 6 in 1 1/2 gallons of water is about equal to 1 quart 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 6, with agitation, and finally the rest of the water. **NOTE:** LOW VOL 6 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 6 and the oil and then add this mixture to the water. However, with adequate agitation, the oil can be added after the LOW VOL 6 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 6 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 1/3 to 2/3 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 1 1/3 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 1/3 to 1/2 pint per acre in the spring at the full tiller stage but before the early boot stage. For improved control of difficult weeds including wild garlic, wild onion, tarweed and groundwell: apply 2/3 to 1 1/3 pints per acre. Since these rates may injure the crop, do not use unless possible crop injury will be acceptable. For the high rates on spring wheat and barley as well as winter wheat and rye consult State Agricultural Experiment Station or Extension Service Weed Specialists for recommendations or suggestions to fit local conditions.

**Spring Seeded Oats:** Apply 1/3 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 1/2 to 1 pint 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 2/3 to 1 1/3 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 6 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 6 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 specialist regarding the use of 2,4-D on your specific hybrid. See chart for recommended rates.

Amount of LOW VOL 6 per Acre		
Crop (See Detailed Directions Above)	For Average Conditions	For Dry Conditions as in Western States*
Corn**		
Preemergence	1 1/3 to 2 2/3 pints	
Postemergence	1/3 pint	1/3 to 1/2 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.

**PREHARVEST CORN TREATMENT:** After the hard dough or denting stage, apply 2/3 to 1 1/3 pints per acre by air or ground equipment to suppress perennial weeds, decrease weed seed production, and control tall weeds such as bindweed, cocklebur, dogbane, jimsonweed, ragweed, sunflower, velvetleaf and vines that interfere with harvesting. Do not forage or feed corn fodder for 7 days following application.

**SORGHUM (MIL0):** Apply 1/3 pint per acre when sorghum is 5 to 15 inches tall. A higher rate of 1/2 to 2/3 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 5 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.

**GRASS SEED CROPS:** Use 2/3 to 1 pint per acre with the amount of water

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