

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

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William M. Mahlburg Agent for: PLATTE CHEMICAL CO., INC. P. O. Box 667 Greeley, CO 80632

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: Label Amendment Submission of 10/11/93 in Response to PR Notice 93-7 EPA Reg. No. 34704-131 CLEAN CROP MCPP GREEN

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, successfully **REMOVES THE FRODUCT FROM THE SCOPE** of PR Notice 93-7 once the comments (if any) on the attached sheet are addressed. Other than the alterations (if any) listed on the attached sheet, no further alterations to the labeling are necessary to reflect the requirements of the Worker Protection Standard.

Since your amendment proposes to delete uses directly and/or to delete uses implicitly through the use of exclusionary statements, the Agency will publish in the Federal Register a notice of receipt of your amendment to delete uses, as required by section 6(f)(1)of FIFRA. The Agency will defer action for 90 days from the date of the Federal Register notice to give affected minor users an opportunity to try to persuade you to retain the uses(s). When the comment period has expired, the Agency will approve the amendment unless you have withdrawn it, and stamp the amended labeling "accepted." Your stampedaccepted labeling will then be sent to you.

As described in Supplement A of PR Notice 93-11 (self-verification option), you may sell and distribute product bearing the submitted labeling before you receive a copy of your stamped-accepted labeling. Note that your registration is not amended until the comment period required by section 6(f)(1) of FIFRA has expired and the Agency has approved the amendment. Therefore, you may withdraw your proposed amendment at any time during the comment period and until you receive your stamped-accepted labeling.



Sincerely,

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



CERTIFICATION FOR DEVIATION

I certify that the revised labeling being submitted for this product is in complete accordance with the labeling requirements of PR Notice 93-7, which reflects the requirements of EPA's labeling regulations for worker protection statements (40 CFR part 156, subpart K), <u>except where noted</u>. I have, in one or more places in the revised labeling, proposed changes that deviate from the exact language or location specified in the PR Notice. I have identified all such statements by highlighting them in a way that distinguishes them from any other label revisions. I have attached an explanation for each proposed deviation. I have proposed no changes to this labeling other than those required to comply with 40 CFR part 156, subpart K. I understand that EPA cannot guarantee to render its decision on revised labeling not in complete conformance with PR Notice 93-7 by April 21, 1994. I understand that it would be a violation of FIFRA if I or my supplemental registrants were to sell or distribute this product after April 21, 1994, without amended labeling complying with the requirements of 40 CFR part 156, subpart K.

THE DEVIATION TO THIS LABEL IS THE ADDITION OF <u>PRE-APPRO /ED</u> EXCLUSIONARY STATEMENTS TO REMOVE PRODUCT FROM THE SCOPE OF WPS.

NAME:

William M. Mahlburg **Registration Manager**

COMPANY: Platte Chemical Co.

DATE: October 11, 1993

PRODUCT: Clean Crop[®] MCPP Green

EPA REG. NO. 34704-131

PROPOSED LABEL



For Ornamental Turfgrass Weed Control ACTIVE INGREDIENT:

Potassium sait of 2-(2-methyl-4-chiorophenoxy)

propionic acid* 48.3% TOTAL 100.0%

*Equivalent to 41.2% of 2-(2-methyl-4-chlorophenoxy) propionic acid or 4 lbs. of MCPP acid per U.S. Gallon at 68°F.

KEEP OUT OF REACH OF CHILDREN CAUTION

Only for Sale To, Use and Storage by Lawncare and Landscaping Personnel or Commercial Applicators. See Below For Additional Precautionary Statements EPA REG. NO. 34704-131 EPA EST. NO. 37507-MT-1 NET CONTENTS 21/2 GALS. (9.46 L) WPSEXP09P93

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PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through the skin. If swallowed, induce vomiting immediately by giving two glasses of water and stick finger down throat. Never give anything by mouth to an unconscious person. Seek medical attention.

Causes eve and skin irritation.

Do not get in eyes. In case of contact flush eyes with planty of water for at least 15 minutes and seek medical attention. Do not allow contact with skin or clothing. Wash exposed skin gently with plenty of soap and water. Wear face shield or goggles, long pants, long-sleeved shirt, shoes and gloves when mixing, loading or applying this product.

ENVIRONMENTAL HAZARDS

Drift or run-off may adversely affect 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 MCPP have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPP 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.

Cleaning of Equipment:

When cleaning ellupment, do not pour the washwater on the ground; spray or drain over a large area away from wells and other water sources. Use care to avoid spray contact or drift to susceptible plants such as beans and other legumes, cotton, flowers, grapes, ornamentals, vegetables and other plants. Do not permit spray mist containing this product 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. 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 8 miles per hour. Do not apply with hollow cone-type insecticide or other nozzles that produce a fine droplet spray. Flush sprayer out on suitable non-crop area after use. Do not use the spray equipment for applying other materials to susceptible crops as injury may result.

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DIRECTIONS FOR USE

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

REENTRY STATEMENT

Do not reenter or permit workers to reenter treated areas until sprays have dried.

STORAGE AND DISPOSAL

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

STORAGE: Do not store below temperatures of 32°F. When stored at lemperatures below freezing, it may be necessary to warm contents to 45°F, and mix thoroughly before using. Store in sale 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Metal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landlill, 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

Read entire label before using this product. **GENERAL INFORMATION**

Not for use on turf being grown for sale or other commercial use as soo or for commercial seed production, or for research purposes

This herbicide may be used on ornamental turf grasses with greater salety than 2,4-D. This herbicide is sale to use on Washington, Toronto and Seaside bentgrasses, Kentucky and Merion bluegrasses. Apply c. a warm calm day when weeds are growing vigorously. Use any suitable sprayer or watering can with fine nose to give a uniform cover of the weeds. Do not apply this product through any type of irrigation system. Although this herbicide is relatively slow in action it gives a superior result on the more difficult to control weeds such as:

More Susceptible Weeds

Controlled by 21/2 pints per acre. Clover

Common chickweed

Lambsouarters Mouse-ear chickweed

Less Susceptible Weeds

Controlled by 4 pints per acre. Repeat applications at half the recommended dosage may give better control.

Pigweed

Plantain

Regweed

Purslane Speedwell

Yarrow 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.

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Black medic

Morning-glory

Knohweed

MCPP GREEN

EPA REG. NO. 34704-131

Preparation of the Spray: Fill half the spray tank with water; then add the required amount of this product. Mix thoroughly, adding the remainder of water during the operation.

Rate of Use	Per 1,000 sq. ft.	Per acre
Established greens	1 fluid oz. in 21/2 gallons of water	21/s plots in 20-40 gallons of water
Established lawns, golf fairways	11/2 fluid oz. in 21/2 gailons of water	4 pints

Time of Application: To obtain the best results this herbicide must be applied when the weeds are most susceptible and conditions are such that no damage to the grasses will occur. Apply when the weeds are growing vigorously. During periods of drought weeds become more resistant to herbicides. Under the same conditions fine grasses are more susceptible to this herbicide particularly when temperatures exceed 90°F. This chemical is absorbed by the foliage of broadleaf weeds and is translocated throughout the whole plant to roots, etc. where it eventually causes death of the plant. Do not cut or mow the lawn 2 to 3 days before or after treatment so that maximum uptake and translocation can occur. Do not spray if rain is likely otherwise the chemical may be washed off before the absorption has taken place. For the same reason do not water the lawn for al least 24 hours after application.

Better control of the weeds classified as Less Susceptible may be obtained with repeat applications of half the recommended dose carried out at not less than monthly intervals.

This product is not recommended for St. Augustinegrass and Centipedegrass, as it can cause damage to these species. Do not use this product on newly sown lawns or turf for six months after planting. Avoid drift onto other plants and do not use the first cuttings after treatment as a mulch for flowers and vegetables.

NOTICE

PLATTE WARRANTS THAT THIS PRODUCT CONFORMS TO THE CHEMICAL DESCRIPTION ON THE LABEL THEREOF AND IS REA-SONABLY FIT FOR THE PURPOSES STATED ON SUCH LABEL ONLY WHEN USED IN ACCORDANCE WITH THE DIRECTIONS UNDER NORMAL USE CONDITIONS. IT IS IMPOSSIBLE TO ELIMINATE ALL RISKS INHERENTLY ASSOCIATED WITH THE USE OF THIS PROD-UCT. CROP INJURY, INEFFECTIVENESS, OR OTHER UNINTENDED CONSEQUENCES MAY RESULT BECAUSE OF SUCH FACTORS AS WEATHER CONDITIONS, PRESENCE OF OTHER MATERIALS, OR THE MANNER OF USE OR APPLICATION, ALL OF WHICH ARE BE-YOND THE CONTROL OF PLATTE. IN NO CASE SHALL PLATTE BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER.

EXCEPT AS EXPRESSLY PROVIDED HEREIN, PLATTE MAKES NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY-KIND, EITHER EXPRESSED OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO, MERCHANTABILITY, FIT-NESS FOR A PARTICULAR PURPOSE, USE OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE.

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FORMULATED FOR PLATTE CHEMICAL CO. 150 SO. MAIN STREET FREMONT, NEBRASKA 64025-5697