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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. William M. Mahlburg
Manager, Regulatory Affairs
Nufarm Limited c/o Nufarm Americas, Inc. SJM Div.
2300 Frederick Avenue, Suite 208
St. Joseph, MO 64506

OCT 10 2003

Dear Mr. Mahlburg:

Subject: 2,4-D Isopropyl Ester
Registration No. 35935-13
Application and Letter Dated September 30, 2003,
Request to Amend Registration To Add Maximum Use
Rates for Forestry and Non-Crop Sites To Label, and
Revised First Aid Labeling Required by PR Notice 2001-
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The labeling referred to above, associated with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable provided that the "implementation paragraph", required under the 2,4-D Exposure Reduction Agreement of 1992, is revised as indicated in **bold** as follows:

"This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994 must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below. **All products released for shipment on or after October 1, 2005 must bear revised labeling complying with the maximum application rates for general non-crop sites; tree, brush and woody plant control on rights-of-way; and forestry use patterns other than site preparation, if registered for such uses.**"

In addition, this label is accepted with the following stipulation: "The Agency is accepting the labeling changes based on your certification that no additional changes, aside from the maximum use rates for forestry and non-crop sites, and First Aid Statements have been made to the label. **Any other labeling changes, except revised First Aid Statements, submitted in connection with this amendment application 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."

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment of this product under this labeling constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. When this technical or manufacturing use product is released for shipment on or after August 1, 2004, it must bear this revised labeling. Please submit one copy of the final printed label before you release the product for shipment.

Sincerely yours,

Joanne I. Miller

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

Enclosure

ACCEPTED
with COMMENTS
In EPA Letter Dated
OCT 10 2003



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

2,4-D Isopropyl Ester

35935-13

FOR THE MANUFACTURE OF HERBICIDES ONLY.

ACTIVE INGREDIENT:

| | |
|--|------|
| Isopropyl ester of 2,4-Dichlorophenoxy-acetic acid | 94%* |
| INERT INGREDIENTS: | 6% |
| TOTAL: | 100% |

*Equivalent to 79% 2,4-D acid. Isomer specific by AOAC method.

KEEP OUT OF REACH OF CHILDREN

WARNING - AVISO

PRECAUCION AL USUARIO: Si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.

See Below For Additional Precautionary Statements.

EPA REG. NO. 35935-13
EPA EST. NO. _____

NET WEIGHT ____ LBS. (____ KG)

EXP09/03

For Chemical Emergency, Spill, Leak, Fire, Exposure or Accident, Call CHEMTREC Day or Night 1-800-424-9300

| | |
|---|--|
| If Inhaled: | <ul style="list-style-type: none"> • 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: | <ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice. |
| HOT LINE NUMBER | |
| Have the container or label with you when calling a poison control center or doctor or going for treatment. You may also call 877-325-1840 for emergency medical treatment information. | |
| Note to Physician: No specific antidote is available. All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred. | |

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING - AVISO

May be fatal if swallowed. Harmful if absorbed through the skin or if inhaled. Avoid breathing vapors. Avoid contact with skin, eyes and clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation persists. Do not use this product in such a manner as to expose workers or other persons. The area where this product is being used must be vacated by unprotected persons.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other 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 EPA.

AGRICULTURAL CHEMICAL.
DO NOT SHIP OR STORE WITH FOODS, FEEDS, DRUGS OR CLOTHING.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. READ ENTIRE LABEL BEFORE USING THIS PRODUCT.

| First Aid | |
|----------------------|--|
| If in Eyes: | <ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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: | <ul style="list-style-type: none"> • 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. |

STORAGE AND DISPOSAL

STORAGE: Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Reclose all partially used containers by tightening all bungs securely. Contents of damaged containers which cannot be repaired, or which cannot be used immediately, should be transferred to suitable sound containers and properly marked. Absorb any spilled material with a suitable clay absorbent and dispose of as indicated under "Pesticide Disposal." For safety and prevention of authorized use, all pesticides should be stored in locked facilities. To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification. Opened, partially used pesticides should be stored in original labeled containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law and may contaminate ground water. 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: Triple rinse (or equivalent), adding rinsate to formulation vessel. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or other procedures approved by state and local authorities.

GENERAL INFORMATION

This product is intended only for the production of herbicides. EPA approved labeling which complies with all pertinent laws and regulations, is required for all formulations produced from this material and must be furnished by formulator.

Adequate protective equipment should be worn when using this product. This should include: Suitable head covering; long-sleeve shirt and long-legged pant, or a coverall type garment; shoes or boots and socks. Impervious rubber gloves should also be included if contact with hands is expected.

This product is intended for formulation into end-use product for use as a plant growth regulator for navel oranges, Valencia oranges, grapefruit (Summer drop, Winter drop), for lemons and for packing house use to maintain healthy buttons on lemons.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential and turf uses after June 15, 1994 must contain the revised label language below. All other products (i.e., agricultural, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below.

GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron."

2. Containers of 5 gallons or more in capacity must also bear the following statement: "A mechanical system (probe and pump) must be used for transferring the contents of this container. If the contents of a non-refillable pesticide container are emptied, the probe must be rinsed before removal."

SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

1. FOR AGRICULTURAL USES

a. Clothing Requirements Statements: "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical-resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."

b. Personal Hygiene Statements: "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

c. The maximum application rate to pasture and rangeland is the lower of (1) existing application rate on currently registered label or (2) 2 pounds 2,4-D acid equivalent per acre per application site.

d. The maximum application rate to forestry site preparation is the lower of (1) existing application rate on currently registered label or (2) 4 pounds 2,4-D acid equivalent per acre per application site.

e. A reentry interval is required and should be in accordance with the Worker Protection Standard, 40 CFR Parts 156 and 170.

2. FOR INDUSTRIAL/AQUATIC USES

a. Clothing Requirement Statements: "When mixing, loading or applying this product or repairing or cleaning equipment used with this product, wear eye protection (face shield or safety glasses), chemical-resistant gloves, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."

b. Personal Hygiene Statements: "Wash hands, face and arms with soap and water as soon as possible after mixing, loading or applying this product. Wash hands, face and arms with soap and water before eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous day's mixing and loading or application of this product without cleaning first. Clothing must be kept and washed separately from other household laundry. Remove saturated clothing as soon as possible and shower."

3. FOR RESIDENTIAL AND TURF SITES:

a. Clothing Requirement Statements: (1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."

(2) For Amine Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks and shoes and rubber gloves.", (3) For Amine Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection." (4) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves.", (5) For Acid, Sodium Salt and Ester Liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."

b. Personal Hygiene Statements: (1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water.", (2) For All Liquid Products: "After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower."

c. The maximum application rate to turf is the lower of (1) existing application rate on currently registered label or (2) 2 pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.

d. The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried or dust has settled."

CONDITIONS OF SALE AND WARRANTY

Manufacturer and Seller offer this product and the Buyer and User accept this product only under the following agreed conditions of sale and warranty.

The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to take into account all variables and to eliminate all risks associated with its use. Injury or damage may result because of conditions which are beyond the control of Manufacturer and Seller. Manufacturer and Seller warrant only that this product conforms to the chemical description on the label and is believed to be reasonably fit for the purposes referred to in the Directions for Use when used as directed under normal conditions. MANUFACTURER AND SELLER MAKE NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. In no case shall Manufacturer or Seller be liable for consequential, special, or indirect damages resulting from the use or handling of this product. Any variation or exception from this Warranty must be in writing and signed by an authorized representative of Manufacturer and Seller.

**Manufactured by
Nufarm Limited
St. Joseph, MO 64506**