

J.R. Fisher
Vertac Chemical Corporation
24th Floor - 5100 Poplar
Memphis, TN 38137

FEB 10 1986

Dear Mr. Sawyer:

Subject: Amendments - New Uses & Weeds: Label Revisions
Weed-Rhap A4-MCPA Herbicide
EPA Registration No. 39511-65
Your Submission Dated January 28, 1986

The amendment referred to above, submitted in connection with registration under section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

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

a. Modify the Environmental Hazards statement to read:

Do not apply directly to water except as stated on labeling.

b. In the Reentry section delete CAUTION and replace with DANGER. Only one signal word may appear on pesticide labeling.

c. Modify the Pesticide Disposal section to read:

Pesticide wastes are acutely hazardous. 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 the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

89688;MOUNTFORT;M-4;KENC0:2/6/86;2/18/86;Kim:ab

SYMBOL							
SURNAME							
DATE							

- d. To the directions for application to flax with Dowpon M Grass Killer, add a statement similar to the following:

Observe the most restrictive limitations, precautions, and directions for use on the product's labeling.

For your information enclosed is PR Notice 82-1.

- e. To the Directions for Use on peas, add the statements:

Do not feed treated vines to livestock. Do not forage or graze treated pea fields.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

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 the product bearing the amended labeling constitutes acceptance of these conditions.

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

Sincerely yours,

Richard F. Mountfort
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosures

Label Code: 0065-005-8510 Container: 5 gal steel Container
 Spec: ----- EPA Approval Date: ----- File: A4-MCPA
 Disk: Label 1 File Date: 10/24/85 Backup: Label 2

VERTAC

WEED RHAP A4-MCPA

MCP AMINE HERBICIDE

*FOR THE SELECTIVE CONTROL OF MANY BROADLEAF WEEDS IN FLAX, SMALL GRAINS,
 RICE, PEAS, CLOVER, ALFALFA AND GRASS PASTURES;
 FOR WHITEBRUSH CONTROL; AND FOR WEED CONTROL IN NON-CROP AREAS.*

ACTIVE INGREDIENTS:

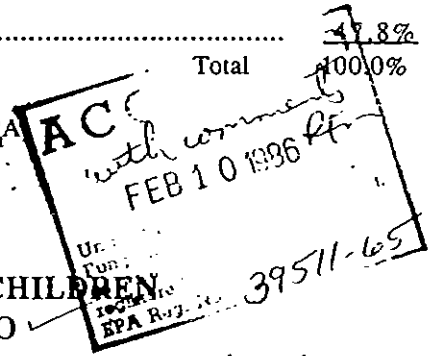
Dimethylamine Salt of 2-Methyl-4-Chlorophenoxyacetic Acid 52.2%

INERT INGREDIENTS:

..... 47.8%
Total 100.0%

(Equivalent to 42.6% or 4 pounds per gallon of MCPA)

EPA Registration Number: 39511-65
 EPA Establishment Number: See side panel



KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO

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

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink one or two glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. Get Medical Attention.

IF ON SKIN: Wash contaminated areas thoroughly with soap and water. Do not reuse contaminated clothing until washed. Do not wear contaminated shoes. Get medical attention if irritation persists.

IF IN EYES: Flush with plenty of water for at least thirty (30) minutes. GET MEDICAL ATTENTION.

Net Contents 18.9 Liters/5 Gallons

Before buying or using this product, read "Warranty Limitations" and "Disclaimer" elsewhere on this label. If terms are not acceptable, return unopened package at once to seller for full refund of purchase price paid. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under the Warranty Limitations and Disclaimer.

Precautionary Statements

DANGER - PELIGRO

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes irreversible eye damage. Harmful if swallowed. May cause skin irritation. Avoid breathing spray mist. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not apply this product in such a manner as to directly or through drift expose workers or other persons. Unprotected persons must leave the area being treated.

ENVIRONMENTAL HAZARDS

Do not apply directly to water. *Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water intended for irrigation or domestic purposes. Do not apply when weather conditions favor drift from target area.*

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE
CALL TOLL FREE
1-800-424-9300

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 THIS LABELING.

RE-ENTRY STATEMENT:

DO NOT enter treated areas without protective clothing until sprays have dried. Protective clothing should include: hat or other suitable head covering, long sleeved shirt and long legged trousers, or a coverall type garment, shoes and socks.

Because certain states may require more restrictive re-entry intervals for various crops treated with this product, consult your State Department of Agriculture for further information.

Written or oral warnings must be given to workers who are expected to be in a treated area or in an area about to be treated with this product. The front panel PRECAUTIONARY STATEMENTS should be read to workers as well as the instruction not to enter until sprays have dried. When oral warnings are given, warnings shall be given in a language customarily understood by workers. Oral warnings must be given if there is reason to believe that written warnings cannot be understood by workers. Written warnings must include the following information:

PAINTER!

CAUTION: Area treated with MCPA on (date of application). Do not enter without appropriate protective clothing until sprays have dried. (Insert here STATEMENTS OF PRACTICAL TREATMENT as on front panel.)

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

STORAGE: Do not store this product near fertilizers, seeds, insecticides, or fungicides. Protect product from freezing. If subjected to freezing conditions, warm to 70°F and agitate. This will return product to original condition. Reclose all partially used containers by thoroughly tightening the screw cap. Damaged or leaking containers, which cannot be used immediately, should be transferred to suitable sound containers and properly marked. Absorb any spill with a suitable clay absorbant and dispose of as indicated under "Pesticide Disposal".

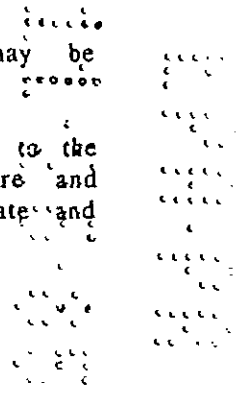
For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities. To prevent accidental misuse, different pesticides should be stored in separate areas with enough distance between to provide clear identification.

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.

*100% reconditioning
2 or 300 lbs
in 200 lbs*

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: Triple rinse (or equivalent), adding rinsate to the spray tank. 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.



GENERAL PRODUCT INFORMATION

63-464-394

USE PRECAUTIONS: MCP amine herbicide is injurious to most broadleaf plants. Salts are the least volatile forms of MCP and do not release enough vapors from treated areas to reduce yield of adjacent susceptible crops. This product is a salt of MCP. Susceptible plants may, however, be injured by physical drift from the application of this product. Do not apply directly to or otherwise permit even minute amounts (such as spray drift) to contact fruit trees, vegetables, flowers, ornamentals, or other desirable plants susceptible to MCP. DO NOT APPLY IN THE VICINITY OF COTTON, GRAPES, TOBACCO OR TOMATOES. Do not use in or near a greenhouse. Do not spray when wind is blowing towards susceptible crops or ornamental plants.

Use coarse sprays to minimize spray drift since, under certain weather conditions, fine spray droplets may drift a mile or more. A spray thickening agent, such as Nalco-Trol*, may be used with this product to aid in reducing spray drift. If used, follow all use recommendations and precautions on the product label.

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*TM, Nalco Chemical Co.

With ground equipment spray drift can be lessened by:

1. Keeping the spray boom as low as possible.
2. Applying 20 gallons or more of spray volume per acre.
3. Using large-droplet producing nozzles.
4. Using no more than 20 psi spray pressure at the nozzles.
5. Spraying only when wind velocity is low.
6. Stopping all spraying when wind exceeds 8 MPH.

Do not use hollow cone-type nozzles or other nozzles that produce large amounts of fine spray droplets.

With aerial equipment drift can be minimized by:

1. Using no more than 20 psi spray pressure at nozzles.
2. By using nozzle types and positions which do not produce fine spray droplets.
3. By using a spray boom no longer than 3/4 the wing or rotor span of the aircraft.
4. By spraying only when wind is less than 6 MPH.

Determine air movement and direction before foliar application. Use a smoke generator or other means at or near the application site for the detection of air movement, air stability or temperature inversions. Such a condition exists when there is little or no wind and air temperature is lower near the ground than at higher levels. Use appropriate drift control measures or avoid application when smoke is moving toward nearby desirable susceptible plants or sensitive areas.

Excessive amounts of this herbicide in the soil may temporarily inhibit seed germination or plant growth. Violent windstorms may move soil particles. If MCP is on soil particles and they are blown onto susceptible plants, visible symptoms may appear. Serious injury is unlikely. The hazard of movement of

464-394

MCP on dust is reduced if treated fields are irrigated or if rain occurs shortly after application.

To avoid injury to desirable plants, do not handle or apply other agricultural chemicals with the same equipment used for MCP, unless it has been thoroughly cleaned with a suitable chemical cleaner.

Local conditions may affect the use of herbicides. Consult your State Agricultural Experiment Station or Extension Service Weed Specialists for advice in selecting treatments from this label to best fit local conditions. Be sure that the use of this product conforms to all applicable regulations. Apply this product only as specified on this label.

WHERE TO APPLY: MCP amine is used to control broadleaf weeds in flax, peas, small grains, established alfalfa and red clover, grass pastures, rangeland, and many non-crop areas. The product will kill or control the following weeds in addition to many other noxious plants susceptible to MCP.

More susceptible weeds (most areas):

Arrow head	Beggartick	Burdock	Cocklebur
Croton (goatweed)	Galinsoga	Goatsbeard	Jimsonweed
Kochia	Lambsquarters	Marshelder	Mint (dragonhead)
Mustard	Pennycress (field)	Pepperweed (field)	Puncturevine
Redstem	Ragweed	Shepherdspurse	Sicklepod
Sneezeweed	Stinkweed	Water Plantain	Witchweed
Yellow Rocket (winter cress)		and many other species.	

Less susceptible weeds:

Burcucumber	Buttercup	Canada Thistle	Catsear
Dandelion	Hempnettle	Hoary Cress	Honeysuckle
Plantain	Pigweed	Purslane	Sow Thistle
Stinging Nettle	Sunflower	Vetch	White Top
Wild Radish			

WHEN TO APPLY: Apply the product during warm weather when weeds are young and actively growing. Uniform spray coverage is necessary for best results. Generally the lower dosages listed will be satisfactory for young, succulent growth of sensitive weed species. For less sensitive species and under conditions where control is difficult, the higher dosages will be needed.

HOW TO APPLY: PREPARING THE SPRAY: Mix the MCP amine with water, unless otherwise indicated on the label. Fill the mixing tank or spray tank with approximately 1/2 the amount of water to be used for spraying. Add the required amount of product with agitation. Add the remainder of the water while continuing to agitate. Note: adding oil, wetting agents, or other adjuvants to the spray may reduce selectivity to crops possibly causing crop damage.

Spraying Conditions: Use a moderate spray pressure of approximately 20 psi. Enough spray volume should be used to give good coverage of the weeds being sprayed. This is usually 5 to 30 gallons by ground application or 3 to 10

gallons by air. Higher spray volumes may be useful in some situations to provide better spray coverage when weeds are especially dense and/or to reduce spray drift.

WEED CONTROL APPLICATIONS

Increased rate

FLAX: For control of susceptible weeds, use 1/2 pint of MCP Amine per acre. Treat flax when 3 to 6 inches tall before buds begin to form. Rates of 3/4 to (1) pint per acre may be needed to control some weeds such as wild buckwheat, smartweed and thistles but flax may be injured at these rates. If seedling grasses such as foxtail are a problem, ⁴⁶⁴⁻⁴⁷⁵ DOWPON® M Grass Killer may be used alone or in combination with MCP Amine. Flax varieties may vary in tolerance to DOWPON® M and MCP. Consult local Extension Service or University Specialists for advice on herbicide use in flax. Do not forage or graze meat animals on treated areas within seven (7) days of slaughter.

*Need fig. 1
explanation
regarding
toxic mixture*

WEED CONTROL IN SMALL GRAINS: NOTE: Do not permit dairy animals, or meat animals being finished for slaughter, to forage or graze treated grain fields within two (2) weeks after treatment. Do not forage or graze meat animals on treated areas within seven days of slaughter.

*Similar
direction
already
resistant*

Wheat, Barley, Oats and Rye not underseeded to Legumes: Use 1/2 to 1 pint of MCP amine per acre for the more susceptible weeds when grains are in the 3 to 5 leaf stage or up to early boot stage. Apply when weeds are very small for best results. Use up to 3 pints MCP amine per acre for the less susceptible weeds after crop has tillered, but not later than early boot stage. Do not apply during the boot to dough stage of the grain.

Wheat, Barley, Oats and Rye underseeded to Alfalfa, Birdsfoot Trefoil, Lespedeza, Red White, or Ladino Clover: For emergency control of susceptible weeds such as mustard and lambsquarters, use 1/3 to 1/2 pint of MCP amine per acre as soon as possible after weeds emerge, but after seedling grain is at least 3 inches tall. The grain and weeds should form a protective canopy over the clover seedlings. Treatment may be made up to the full tiller stage, but not in the boot to dough stages of the grain. To control certain weed species, (1) pint per acre may be needed. Do not use where small seeded legumes, especially vetch, sweet clover, trefoil or alfalfa, are seeded unless injury to them can be tolerated.

Increased rate

RICE: For control of certain broadleaf weeds and sedges, apply 2 to 3 pints of MCP amine in 10 to 30 gallons of water per acre. Treat when rice is fully tillered and 6 to 8 inches above water, usually 35 to 65 days after planting. Do not treat when rice is in the early seedling, boot or early heading stages, or when air temperature is over 90° F. Some rice varieties may be less tolerant to MCP than others. Consult your Agricultural Experiment Station or Extension Service Weed Specialists for appropriate rates and timing of MCP spray and on the tolerance of rice varieties. Do not grow crayfish or catfish in treated rice fields.

RICE IN CALIFORNIA: For early season broadleaf weed and sedge control in rice, apply 1 to 1 1/2 pints of MCP amine herbicide per acre by air in 8 to 10 gallons of total spray volume, when rice is in the 3 leaf stage, and with

NEW -

well established root systems, usually 18 to 24 days after planting. Applications made during hot weather or at the higher dosage rate may cause temporary stunting of the rice. For maximum effectiveness, the weeds should be exposed at time of treatment. If retreatment is necessary, usually 35 to 65 days after planting, the total amount of MCP amine per acre, applied in the two applications, must not exceed 3 pints per season. Do not grow crayfish or catfish in treated rice fields.

PEAS: Use on peas to control susceptible weeds only where recommended by local Agricultural Extension Service or Experiment Station Specialists. Use 1/4 to 1/3 pint of MCP amine in at least 15 gallons of water per acre when peas are 3 to 7 inches tall, before first flowering, and weeds are small. Higher rates of 1/2 to 3/4 pint per acre may be used to improve control of difficult weeds, but crop injury is more likely to occur. Do not apply if peas are taller than 7 inches or when they are stressed for lack of soil moisture. Do not apply when air temperature is over 90°F. NOTE: MCP can cause injury and delayed maturity in the pea crop. Do not feed treated peas to livestock.

NEW -

ESTABLISHED ALFALFA OR RED CLOVER: For control of yellow rocket and other susceptible annual weeds such as pennycress or fanweed, use 1 pint of MCP amine per acre. Apply in late fall after frost has killed legume top-growth and legumes are dormant. The temperature at time of spraying should be above 40°F.

NEW -

GRASS PASTURES (INCLUDING GRASS GROWN FOR SEED): Use 2 to 4 pints of MCP amine per acre. Apply when weeds are small and actively growing for best results. Use the higher rates for whitetop, Canada thistle, buttercup and other more difficult to control weeds. Spray perennials in early bud to full bloom stage and regrowth in fall. Legumes may be injured or killed. Do not use this treatment where legumes, especially alfalfa, are present and desirable. In some areas bent, buffalo, carpet and St. Augustine grasses may be susceptible to injury. Do not use on newly seeded areas until grass is well established. Do not use from early boot to milk stage where grass seed production is desired.

Increased rate

CONTROL OF WHITEBRUSH ON RANGELAND: Use 3 pints of MCP amine with 1 gallon of diesel oil and enough water for good spray coverage, usually 6 to 10 gallons per acre by aircraft. Apply in spring or fall when plant foliage is well developed and actively growing. Spraying during bloom is recommended but not immediately after shredding of blossoms. Retreatments may be needed in succeeding years. NOTE: First mix the MCP amine in the water, then add the oil with agitation. Spray must be kept agitated during spraying to avoid separation in the tank.

NEW -

NON-CROP AREAS: For control of susceptible weeds in fencerows, fallowlands, rights-of-way, roadsides, and similar areas, use 6 pints of product per acre in enough water to give sufficient coverage. NOTE: on fallow land, do not plant any crop for 3 months after treatment or until chemical has disappeared from soil.

SPOT TREATMENT: For weed control in pastures, rangelands and in non-crop area such as fencerows, farmyards, shelter-belts and roadsides: Use 1/4 pint of MCP amine in 3 gallons of water to control weeds such as Canada thistle.

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whitetop, meadow buttercup and Texas blueweed. Apply when weeds are growing vigorously, usually prior to bloom, and spray fall regrowth if necessary.

WARRANTY LIMITATIONS AND DISCLAIMER

Vertac Chemical Corporation warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the Directions For Use when used under normal conditions. THIS IS THE ONLY WARRANTY MADE ON THIS PRODUCT. NO OTHER EXPRESS AND NO IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE OUTSIDE OF THIS LABEL. Therefore, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use of this product contrary to label instructions (including conditions noted on the label, such as unfavorable temperatures, soil conditions, etc.), under abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes, etc.) or under conditions not reasonably foreseeable to or beyond the control of seller.

When buyer or user suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), buyer or user must promptly notify in writing Vertac Chemical Corporation of any claims to be eligible to receive either remedy given below. The EXCLUSIVE REMEDY OF THE BUYER OR USER and the LIMIT OF LIABILITY of Vertac Chemical Corporation or any other seller will be one of the following, at the election of Vertac Chemical Corporation:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

The seller will not be liable for consequential or incidental damages or losses.

The terms of this Warranty Limitations and Disclaimer cannot be varied by any written or verbal statements or agreements. Any employee or sales agent of the seller is not authorized to vary or exceed the terms of this Warranty Limitations And Disclaimer in any manner.

VERTAC CHEMICAL CORPORATION
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USA

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Dowpon is a Registered Trademark of The Dow Chemical Company.

EPA Establishment No: A. 39511-AR-1
B. 40831-MT-1

Establishment number used is indicated by letter in lot number.

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