Z.M. Bellet, Ph.D. Vertac Chemical Corp. 24th Floor, 5100 Poplar Memphis, TN 38137

APR 28 1986

Dear Dr. Bellet:

Subject: Amendment: Delete Strawberries
Weed-Rhap LV Granular Herbicide
EPA Registration No. 39511-77
Your Submission Dated April 16, 1986

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. The draft labeling submitted is acceptable, provided the following changes are made on finished copy before shipment:

- a. Under Environmental Hazards, change the reference to irrigation or domestic water purposes to read: Do not contaminate water intended for irrigation or domestic purposes.
- b. Align the ingredient percentages to the same margin in the ingredient statement.
- c. Under directions in lakes and ponds, clearly state the rate per 430 sq ft as 1 to 1 1/2 lbs

Submit one copy of the revised, printed label before shipment. We have no objection to use of the existing stock through the 1986 use season.

A stamped copy of the draft label is enclosed.

Sincerely yours,

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

#9772:Mountfort:MF-5:KENCO:4/25/86:5/5/86:eg:VO

CONCURRENCES								
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DATE								1.

EPA Form 1320-1 (4-81)

OFFICIAL FILE COPY

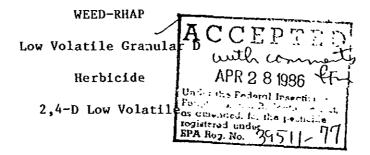
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LABEL CODE: 77-1b-851 CONTAINER: 50 1b Bag. CONTAINER SPEC. NO: -----EPA APPROVAL DATE: 22May80 DISK: Label6 FILE: Two Four D WR G
Checked for EPA requirements and format? YES.

SPECIAL INFORMATION: Storage and disposal for paper bag. Must be changed for plastic. Submitted to Simmons for type set:1/15/85.

VERTAC



Equivalent to 18.8% of 2,4-D AE by weight*

Isomer specific by AOAC Method 6.275 (13th ed.), 1980.

EPA REG. No. 39511-77 EPA EST. No. 39511-AR-1 * An isooctyl ester.

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

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 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. Get medical attention if irritation persists.

IF IN EYES: Flush with copious amounts of clean water for 10-15 minutes. Get medical attention.

Net Contents: Fifty Pounds/ 22.7 Kilos

SEE SIDE PANELS FOR ADDITIONAL PRECAUTIONARY STATEMENTS

PRECAUTIONARY STATEMENTS

CAUTION

Hazat

Humans and Domestic Animals

Harmful if swallowed. Avo. breathing dust. 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 apply this product in such a manner as to directly or through drift expose workers or other persons. The area being treated must be vacated by unprotected persons.

Environmental Hazards

Do not apply directly to water except as specified on this label for aquatic weed control. Do not contaminate water by cleaning of equipment or disposal of wastes. Do not contaminate water intended for irrigation or domestic purposes, except as specifically directed in the labeling. 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 inconsistant? with this labeling.

RE-ENTRY STATEMENT:

Do not enter treated areas without protective clothing. 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. When oral warnings are given, warnings shall be given in 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:

CAUTION: Area treated with 2,4-D on (date of application). Do not enter without appropriate protective clothing. (insert here StateLents of Practical Treatment as on front panel.)

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 bags by rolling down top and securing. Damaged or leaking bags which cannot be used immediately should be transferred to suitable sound containers and properly marked. Sweep up any spilled material and transfer to container. Product that is unsuitable for use according to label directions should be disposed of as instructed under "Pesticide Disposal".

For safety and prevention of unauthorized use, all pesticides should be spored 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 <u>labeled</u>. 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, 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 Envvironmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

General Information

Weed Rhap Low Volatile Granular D is formulated by impregnating selected mineral granules with low volatile 1,4-D ester, to minimize drift. The 8/16 and 15/30 mesh sizes are intended for use in the control of certain water weeds which infest lakes and ponds. The 24/48 mesh size is recommended for the control of certain weeds which infest turf grass and crops such as corn, and cranberries.

Avoid application to susceptible plants because this product may injure such plants as cotton, soybeans, tomatoes, beans, peas, fruit trees and ornamentals. DO NOT allow paritcles or dust to drift onto desirable crops or plants.

Although this product contains a low volatile ester, it should be used with caution where spreading vapors can damage nearby susceptible plants.

It is best to use separate equipment for applying 2, 4-D granules. Should the same equipment be used for applying other materials, however, clean it thoroughly before such use to remove all traces of 2, 4-D particles or dust.

DIRECTIONS FOR USE

IN LAKES AND PONDS: To control Milfoil, Hornwort, Bladderwort, Fanwork, Pondweed, Cattail, and Waterlilies infesting lakes and ponds, apply granules at the rate of 1 to 1 12 lbs, per 430 sq. ft. (10' x 43') of water surface or 100 to 150 lbs. per acre. Distribute the granules evenly over the quiet water surface infested with weeds, using a mechanical spreader attached to a boat. The granules settle to the water bottom around the roots and stems. Effects on water weeds will be evidenced in 4 to 10 weeks and control may be expected for a year or longer. In tropical regions use 25 to 50 percent more granules. Consult your Public Water Agency before use.

DO NOT APPLY to more than 1/3 to 1/2 of a lake or pond in any one month because excessive decaying vegetation may deplete oxygen content of water, thus killing fish.

ORNAMENTAL TURF such as lawns, golf courses, cemeteries, and parkways: To control wild onion and broad-leaved weeds such as Dandelion, Plantain, Ity; Bitterweed, and Dogfennel, apply 10 to 15 lbs. of granules per acre in early spring when shoots are young and actively growing, using a mechanical spreader. Repeat application in one month to control skipped spots. Weeds over 6 inches tall are sometimes resistant and should be sprayed with Weed-Rhap A-4D or Weed-Rhap Low Volatile 4D.

DO NOT USE on Bentgrass, St. Augustine grass; Dichondra, Carpetgrass, or newly plugged or seeded turf.

IN CORN: For pre emergence application to aid control of annual grasses such as large and small Foxtail, Crabgrass, Baryardgrass, broad-leaved weeds such as Smartweed, Sinflower, Wild Mustard, Cocklebur, Bindweed, Dandelion, and Morningglory apply as follows: With a granule applicator designed to apply a band over the planted row, apply 3 to 3 1/4 lbs. per acre in a band 14 inches wide when rows are 42 inches apart. If the planting varies from this standard band width, or row separation, the granules should be applied proportionately. Be sure the granules are allowed to stay on top of the soil, prefereably, they should be applied behind the packer wheel at planting time. Be sure the corn is planted 2 1/2 to 3 inches dea, as damage may occur to shallow planted corn. DO NOT apply on sandy soil (For Corn Belt Only).

IN CRANBERRIES: For pre-emergence application to control annual broadleaved weeds in bearing cranberry marshes, apply at a rate of 10 to 20 lbs. per acre (2 to 4 lbs. 2,4-D equivalent per acre) Application should be made broadcast in the spring after removal of the winter flood from the dormant vines. Weeds controlled are Common ragweed, Sticktight, Teathumb, Smartweed, Northern Saint Johnswort, and common species of Annual Smartweed, careful distribution of the granules is necessary if adequate control is to be obtained. Granules may also be distributed on ice over plants prior to spring thaw (for Wisconsin area).

CONDITIONS OF SALE AND WARRANTY

VERTAC AND SELLER OFFER THIS PRODUCT AND THE BUYER AND USER ACCEPTS THIS PRODUCT 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 Vertac or the Seller. Vertac warrants 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 of Use when used as directed under normal conditions. VERTAC MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. In no case shall Vertac or the 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 Vertac representative.