

MAY 24 1991

Ms. Carol F. DiRenzo
Registration Specialist
Agrolinz, Inc.
1755 Kirby Parkway, Suite 300
Memphis, TN 38120

BEST AVAILABLE COPY

Dear Ms. DiRenzo:

Subject: MCPA Ester 4
EPA Registration No. 42545-44
Your Application of March 11, 1991

We have completed our review of the labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended. We find that the changes you propose are acceptable, including the product name change to SEE[®] MCPA Ester. A stamped copy is enclosed for your records.

However, as a matter of new policy, there is a change in the language under the **Environmental Hazards** section of the label which affects all subsequent registrations and amendments. Your statement, "Do not apply directly to water or wetlands (swamps, bogs, or marshes)," should be revised to read as follows: "Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark."

Please submit 5 copies of your final printed label incorporating these changes.

Thank you.

Sincerely yours,

Joanne I. Miller
Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (H7505C)

H7505C:Miller/Mayer:jem:Rm235:357-8218:05/24/91

Enclosure

297

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated: 1

MAY 24 1981

AGROLINZ, INC.

MCPA ESTER 4

HERBICIDE

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

42545-44

**FOR SELECTIVE CONTROL OF CERTAIN WEEDS
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND
AND IN NON-CROP AREAS**

ACTIVE INGREDIENT:

Isooctyl ester of 2 methyl-4-chlorophenoxyacetic acid*.....69.7%
INERTINGREDIENTS:.....30.3%

* Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer
specific of not less than 3.7 pounds of 2-methyl-4-
chlorophenoxyacetic acid isomer specific per gallon at 68°F.
Isomer specific by AOAC Method.

EPA Reg. No. 42545-44

EPA Est. No. 42545-MO-1

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.

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Contains mineral spirits. Do not induce vomiting.
Get medical attention immediately. Never give anything by mouth
to an unconscious person.

IF ON SKIN: Wash with soap and water.

IF IN EYES: Flush with plenty of water for 15 minutes and get
medical attention.

NOTE TO ATTENDING PHYSICIAN: May cause chemical pneumonitis if
aspirated. If lavage is performed, suggest endotracheal and/or
esophagosopic control.

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE
CALL CHEMTREC (800) 424-9300**

**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.**

BEST AVAILABLE COPY

3 9 7

PRECAUTIONARY STATEMENTS

WARNING - AVISO

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Causes eye and skin irritation. Do not get in eyes, on skin, or on clothing. Harmful if swallowed. Do not breathe vapors or spray mist. Mixers/loaders or applicators are required to use face shields or goggles.

ENVIRONMENTAL HAZARDS

Do not apply directly to water or wetlands (swamps, bogs, marshes and potholes). Do not contaminate water when disposing of equipment washwaters.

Do not apply when weather conditions favor drift from target area.

Spray equipment used in applying this product should be thoroughly cleaned before using for any other purposes. Use repeated flushing with soap and warm water or suitable chemical cleaner. It is best to use a separate sprayer for application of insecticides and fungicides. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not contaminate water by cleaning of equipment or disposal of wastes.

This product will kill or seriously injure many desirable forms of vegetation. Do not apply directly to flowers, fruits, vegetables, grapes, ornamentals, cotton or other desirable plants. Do not use when there is hazard from drifting mists. (Coarse sprays are less likely to drift.) Vapors from this product may injure susceptible plants in the immediate vicinity. Do not apply MCPA isooctyl ester in the vicinity of sugar beets. Do not apply MCPA isooctyl ester around houses, recreation sites or similar areas.

Avoid contamination of water used for domestic purposes and irrigation purposes. Excessive amounts of this product in the soil may temporarily inhibit seed germination and plant growth.

Most cases of groundwater contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and 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.

PHYSICAL OR CHEMICAL HAZARDS

Do not use, pour, spill or store near heat or open flame.

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 enter treated areas without protective clothing until sprays have dried. Protective clothing means, at least, a hat or other suitable head covering, a long-sleeved shirt and long-legged trousers or a coverall type garment (all of closely woven fabric covering the body, including the arms and legs), shoes and socks.

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

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE

Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product.

Handle in accordance with information given under "Precautionary Statements".

Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal". Repackage and relabel usable product in a sound container.

In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

DISPOSAL

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 CONTAINERS - 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 CONTAINERS - 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.

CONTROLS THESE AND OTHER WEEDS

SUSCEPTIBLE (MOST AREAS)

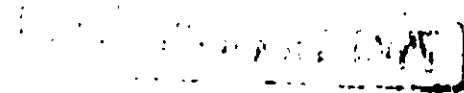
Annual sowthistle	Lambsquarters	Shepherdspurse
Beggarticks	(goosefoot)	Stinkweed
Cocklebur	Marsh elder	(pennycress,
Dragon head mint	Mustards (annual)	fanweed)
Field pepper grass	Poison hemlock	Wild radish
Goats beard	Puncturevine	Yellow rocker
Hempnettle	Ragweed	or wintercress

LESS SUSCEPTIBLE

Buttercups	Perennial	Stinging nettle
Canada thistle	sowthistle	Vetch
Chervil	Plantains	White top or
Dandelions	Purslane	hoary cress
Kochia	Russian pigweed	
Miner's lettuce	Sunflower	

PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water. then add the recommended amount of MCPA ESTER 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.



GRASSES: (Grown for seed: aerial and surface applications): Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered.

NOTE: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. In some areas bentgrass, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

NON-CROP SPRAYING ALONG FENCE ROWS AND ROADSIDES

Canada thistle, white top and meadow buttercup - For spot treatment, use 1/4 pint to 3 to 4 gallons of water, or 3/4 gallon in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station weed specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

WARRANTY LIMITATIONS AND DISCLAIMER

Seller 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

Do not apply MCPA isooctyl ester by aerial application in the vicinity of sugar beets. Do not apply MCPA isooctyl ester around houses, recreation sites, or similar areas.

AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 1 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

SELECTIVE SPRAYING

WHEAT, OATS, BARLEY AND RYE

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3 pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage. Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter. Do not forage or graze dairy animals on treated areas within 7 days after treatment.

FLAX

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as 3/4 pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter. Do not forage or graze dairy animals on treated areas within 7 days after treatment.

GRASSES

ESTABLISHED GRASSLAND - Use 1 to 3 pints per acre in sufficient water (1 to 10 gallons) by airplane or ground sprayer application and give thorough coverage. Use higher rate for white top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing. Do not forage or graze meat animals on treated areas within 7 days of slaughter. Do not forage or graze dairy animals on treated areas within 7 days after treatment.

BEST AVAILABLE COPY