

APR 04 1991

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

Dear Ms. DiRenzo:

Subject: Label Amendment - Revised Label Text
Visko-Rhap 2D Low Volatile Ester Herbicide
EPA Registration No. 42545-32 42750-17
Your Submission dated March 11, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

- 1) We have noted the sentence "Do not graze dairy animals on treated pastures within 7 days after application" directly below the CONTAINER DISPOSAL statements. If this product is intended for use in pastures, position this statement under the WHERE TO USE heading and add "Do not apply this product within 30 days of cutting grass for hay. Remove meat animals from treated areas 3 days prior to slaughter." If it is not intended for use in pastures, delete the statement.
- 2) Add the appropriate net contents statement to the front panel.

A stamped copy is enclosed for your records. Please submit five (5) final printed copies for the referenced label, incorporating the above changes.

Please note that all future label amendment submissions must include five (5) copies of the sample label.

Sincerely yours,

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

Enclosure

CONCURRENCES							
SYMBOL	H7505C						
SURNAME	D. KENNY						
DATE	4/4/91						

AGROLINZ, INC.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

VISKO-RHAP® 2D

LOW VOLATILE ESTER HERBICIDE

APR 04 1991

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

ACTIVE INGREDIENT:

3-ethylhexyl ester** of
2,4-D-dichlorophenoxyacetic acid*.....35.6%

42750-17

42545-32

INERT

INGREDIENTS:.....64.4%

** An isooctyl ester

* Equivalent to 23.6% of the 2,4 isomer of 2,4-D or not less than
1.92 pounds of the 2,4 isomer of 2,4-D per gallon.

Isomer specific by AOAC Method No. 6.D01-6.D05

EPA Reg. No. 42545-32-42750-17

EPA Est. No. 42545-MO-1

KEEP OUT OF REACH OF CHILDREN

CAUTION - CAUCION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Drink 1 or 2 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 with plenty of soap and water. Get medical
attention if irritation persists.

IF IN EYES: Flush with water for 15 minutes. Get medical
attention.

See Side Panel for Additional Precautionary Statements

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

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly after handling. Harmful if inhaled. Avoid breathing spray mist. 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. The area being treated must be vacated by unprotected persons. When handling this product, wear chemical resistant gloves.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Drift or runoff may adversely affect aquatic invertebrates and nontarget plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters.

Most cases of groundwater contamination involving phenoxy herbicides such as 2,4-D have been associated with mixing/loading and disposal sites. Caution should be exercised when handling 2,4-D 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.

DIRECTIONS FOR USE

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

Do not apply this product through any type of irrigation system.

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, feed, seeds, fertilizer,

insecticides or fungicides by transport, storage, disposal or cleaning of equipment. Open dumping is prohibited. Do not use or store near heat or open flame. Do not store near other pesticides or seeds. Do not reuse containers. Store at temperatures above 32°F. If allowed to freeze, remix before using.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of federal law and may contaminate groundwater. 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:

METAL CONTAINER - 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.

Apply this product only as specified on this label.



Do not graze dairy animals on treated pastures within seven days after application.

NOTE: Do not mix with liquid fertilizers.

VISKO-RHAP formulations are designed to produce thick invert emulsions when used in the Two-Fluid Spray System. The formulation and water enter the spray system separately, to be mixed in a special chamber as the spraying is performed.

This product when used as directed forms a thick invert emulsion that breaks up into large spray droplets, which are least likely to drift. However, minute quantities can cause injury by drift, and application conditions that permit drift of spray should be avoided. Do not allow this chemical or dilution of it to come in contact with susceptible broadleaf plants that are desirable such as cotton, soybeans, tomatoes, grapes, clover and other legumes, ornamentals. Excessive amounts of this product in the soil may temporarily inhibit seed germination and all plant growth. Do not use the same spray equipment for other purposes where even trace amounts of this chemical may cause injury.

Users should note that herbicide treatment of public waters requires a permit from appropriate state agencies in most states. Your State Conservation Department or Game and Fish Commission will aid you in securing a permit if required in your state.

WHERE TO USE

VISKO-RHAP LOW VOLATILE ESTER 2D is to be applied as an invert emulsion to control broadleaf weeds, brush and woody plants in rights-of-way, industrial sites, fencerows, similar non-crop areas, and for aquatic weed control in drainage ditches, ponds, lakes, marshes, and similar water areas.

WEEDS, BRUSH AND WOODY PLANTS CONTROLLED

VISKO-RHAP LOW VOLATILE ESTER 2D will kill or control the following weeds, brush and woody plants as well as many others susceptible to 2,4-D:

WEEDS	BRUSH/WOODY PLANTS
Alligatorweed	Ash
Artichoke	Black gum
Bitter	Boxelder
wintercress	Elm
Bull thistle	Hickory
Bur ragweed	Honeysuckle
Canada thistle	Locust
Chickweed	Oak
Cocklebur	Poison ivy
Creeping jenny	Red maple
Duckweed	Sagebrush
Goldenrod	Sassafras
Hemp	Sumac
Indigo	Willow
Jimsonweed	
Locoweed	
Morningglory	
Pickerelweed	
Plantain	
Povertyweed	
Purslane	
Russian	
thistle	
Sowthistle	
Stinkweed	
Virginia Creeper	
Waterlily	
Wild garlic	
Wild lettuce	
Wild radish	
Arrowhead	
Bindweed (hedge,	
field, European)	
Buckhorn	
Burdock	
Buttercup	
Catnip	
Chickory	
Coffeebean	
Curly indigo	
Elderberry	
Ground ivy	
Hoary cress	
Ironweed	
Lambsquarters	
Mexicanweed	
Mustard	
Pigweed	
Pokeweed	
Puncturevine	
Rush	
Shepherdspurse	
Smartweed	
Spatterdock	
Sunflower	
Waterhyacinth	
Water smart-	
weed	
Wild onion	

For best performance dilute and mix 1 part of Visko-Rhap Low Volatile Ester 2 D with 1-3 parts of No. 2 fuel oil or kerosene before placing it in the supply tank.

This special formulation is designed for use in the Two-Fluid Spray System. The formulation and water SHOULD NOT be mixed before use.

Best results are obtained when spraying is done while weeds are young and actively growing.

Application rates of 2 to 6 pounds per acre (1 to 3 gallons of product) of 2,4-D acid equivalent are recommended, depending on weed density, height, and species.

For emergent and floating aquatic weeds in drainage ditches, lakes, ponds, marshes, and similar water areas:

Use 1 to 2 gallons of product per acre to control the emergent weeds arrowhead, pickerelweed, rush, spatterdock, waterlily, and water smartweed; use 2 to 3 gallons of product per acre to control the emergent weed alligatorweed. Use 1 gallon of product per acre to control the floating weed duckweed. Application should be made when leaves are fully developed above water line and plants are actively growing. Depending on plant size use sufficient volume of spray to give coverage of all weeds. Repeat application if regrowth occurs. Consult your State Game and Fish Department or Water Control Agency prior to application of this product for aquatic weed control.

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, killing fish.

**GROUND APPLICATION (HANDGUN, MANIFOLD OR SPRAY BOOM)
AS AN INVERT EMULSION**

Fill water tank with fresh clean water. Add Visko-Rhap Low Volatile Ester 2D herbicide to the formulation tank. Use orifices to give desired chemical-to-water ratio in the range of 1:7 to 1:15. Adjust pressure to suit the spray job being done. Do not exceed 40 psi when using spray boom. Do not exceed 100 psi when using handgun or manifold.

**CONDITION OF SALE, WARRANTY,
LIMITATION OF LIABILITY**

This product conforms to the chemical description on the label thereof and is reasonable fit for the purpose stated on such label only when used in accordance with directions under normal use conditions. Follow directions carefully. Timing and method of application, weather and crop conditions, mixture 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. In no case shall the seller be liable for consequential, special, or indirect damages, such as loss of profits or values resulting from the use or handling of this product.

**IN CASE OF EMERGENCY
CALL CHEMTREC: 1-800-424-9300**

Manufactured by:

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