

Alice Walker, Ph.D.
REGULATORY CONSULTING • 47 COUNTRY CLUB DRIVE • SENATOBIA, MS 38668

CERTIFIED MAIL

February 1, 1993

Ms. Joanne I. Miller (PM 23)
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division (H7505C)
401 M Street, S.W.
Washington, D.C. 20460

RE: 2,4-D Labeling Exposure Reduction Measures Dated October 30, 1992
VISKO-RHAP 2D (EPA Reg. No. 42545-32) 42750-17

Dear Ms. Miller:

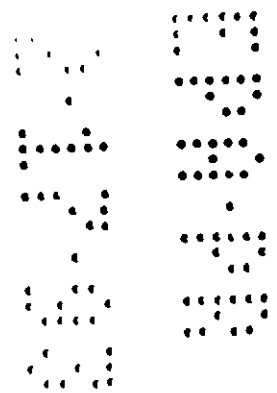
Below is certification of compliance together with two (2) each of appropriately revised labeling for subject 2,4-D registration held by Agrolinz, Inc.

I, being an authorized representative of Agrolinz, Inc., certify that all containers of VISKO-RHAP 2D (EPA Reg. No. 42545-32) produced by October 23, 1993 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing-use products. I further certify that all containers of said product sold or distributed by this company by April 15, 1994 will bear revised labeling in accordance with the revised labeling required for Task Force technical and manufacturing products.

Sincerely yours,

Alice Walker, Ph.D.
Regulatory Consultant

/s
Enclosures
cc: Mr. Greg Mulhall
Albaugh, Inc.



AGROLINZ, INC.

VISKO-RHAP® 2D

LOW VOLATILE ESTER HERBICIDE

ACTIVE INGREDIENT:

2-ethylhexyl ester* of 2,4-Dichlorophenoxyacetic acid**.....35.64%

INERT INGREDIENTS:.....64.36%

TOTAL.....100.00%

*An isooctyl ester

**Equivalent to 23.64% 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 42750-111

EPA Est. No. 42545-MO-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

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.

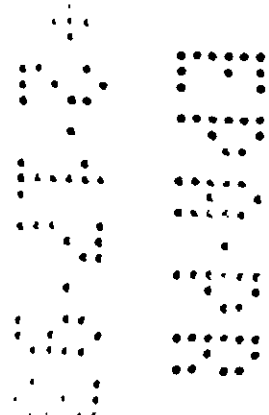
IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

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

See Side Panel for Additional Precautionary Statements

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE

CALL CHEMTREC (800)424-9300



PRECAUTIONARY STATEMENTS

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash thoroughly after handling. Harmful if inhaled. Avoid breathing spray mist. 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 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 (nitrile), long-sleeved shirt, long pants, socks and shoes. For aerial applicators in enclosed cockpits and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required.

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 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.

If this container contains over 1 gallon and less than 5 gallons, persons engaged in open pouring of this product must also wear coveralls or a chemical-resistant apron.

If this container contains 5 gallons or more in capacity, 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.

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.

BEST AVAILABLE COPY

DIRECTIONS FOR USE

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

AGRICULTURAL USE REQUIREMENTS

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. 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.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear: eye protection (face shield or safety glasses), chemical-resistant gloves (nitrile), long-sleeved shirt, long pants, socks, and shoes.

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.

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.

BEST AVAILABLE COPY

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, and 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 because 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.

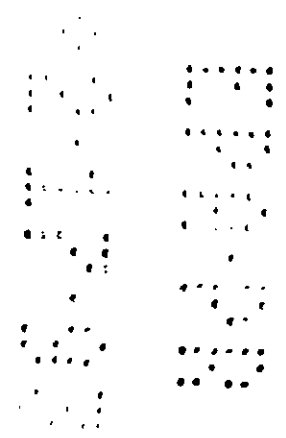
WHERE TO USE

VISKO-RHAP LOW VOLATILE ESTER 2D is used to control broadleaf weeds in rights-of-way, industrial sites, fence rows, similar non-crop areas, and for aquatic weed control in drainage ditches, ponds, lakes, marshes, and similar water areas.

WEEDS CONTROLLED

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

- | | |
|--|------------------|
| Alligator weed | Locoweed |
| Arrowhead | Mexicanweed |
| Artichoke | Morningglory |
| Bindweed (hedge, field,
and European) | Mustard |
| Bitter Wintercress | Pickerelweed |
| Boxelder | Pigweed |
| Buckhorn | Plantain |
| Bull Thistle | Poison Ivy |
| Burdock | Pokeweed |
| Bur Ragweed | Povertyweed |
| Buttercup | Puncturevine |
| Canada Thistle | Purslane |
| Catnip | Rush |
| Chickweed | Russian Thistle |
| Chickory | Sagebrush |
| Cocklebur | Shepherdspurse |
| Coffeebean | Smartweed |
| Creeping Jenny | Sowthistle |
| Curly Indigo | Spatterdock |
| Duckweed | Stinkweed |
| Elderberry | Sumac |
| Goldenrod | Sunflower |
| | Virginia Creeper |



Ground Ivy
Hemp
Hoary Cress
Honeysuckle
Indigo
Ironweed
Jimsonweed
Lambsquarters

Waterhyacinth
Waterlily
Water Smartweed
Wild Garlic
Wild Lettuce
Wild Onion
Wild Radish
Willow

For best performance dilute and mix 1 part of Visko-Rhap Low Volatile Ester 2D 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): 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 p.s.i. when using spray boom. Do not exceed 100 p.s.i. 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 reasonably fit for the purpose stated on such label only when used in accordance

BEST AVAILABLE COPY

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.

Manufactured by:

AGROLINZ, INC.
6525 Quail Hollow, Suite 107
Memphis, TN U.S.A. 38120-1309
Phone (901) 756-4422 - Telex 6828022

