

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
SEE® 2,4-D (EPA Reg. No. 42545-43)

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 SEE® 2,4-D (EPA Reg. No. 42545-43) 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,

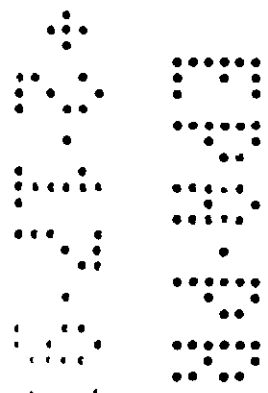


Alice Walker, Ph.D.
Regulatory Consultant

/s

Enclosures

cc: Mr. Greg Mulhall
Albaugh, Inc.



2 3 11
AGROLINZ, INC.

SEE® 2,4-D

LOW VOLATILE ESTER HERBICIDE

CONTAINS NO SOLVENT

ACTIVE INGREDIENT:

Isooctyl ester of 2,4-Dichlorophenoxyacetic Acid61.74%

INERT INGREDIENTS:.....38.26%

TOTAL.....100.00%

* Equivalent to 40.9% of 2,4 Isomer of 2,4-D or not less than 3.76 pounds of the 2,4 Isomer of 2,4-D per gallon. Isomer specific by AOAC Method No. 6.288, 14th Edition, 1984.

KEEP OUT OF REACH OF CHILDREN

CAUTION

STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED: Call a physician or poison control center. Drink 1 or 2 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.

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

IF IN EYES: Flush with plenty of water. Get medical attention if irritation persists.

See Side Panels for Additional Precautionary Statements.

EPA Reg. No. 42545-43

EPA Est. No. 42545-MO-1

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE,

CALL CHEMTREC (800)424-9300

BEST AVAILABLE COPY

PRECAUTIONARY STATEMENTS

CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing. May produce skin sensitization reaction in certain individuals. 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.

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

CONDITION OF SALE, WARRANTY,

LIMITATION OF LIABILITY

This product conforms to the chemical description on the label thereof and is reasonably fit for the purposes 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 his 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.

DIRECTIONS FOR USE

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

Re-Entry for Turf Sites (excluding sod farms): Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

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.

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 in language customarily 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 until sprays have dried. (Insert here Statements of Practical Treatment as on front panel.)

BEST AVAILABLE COPY

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.

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:

PLASTIC CONTAINERS - Triple rinse (or equivalent) adding rinsate to spray tank. 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.

METAL CONTAINERS - Triple rinse (or equivalent) adding rinsate to 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 INFORMATION

Performance of SEE® 2,4-D may be affected by local conditions, crop varieties, and application method. User should consult local extension service, agricultural experiment, or university weed specialists, and state regulatory agencies for recommendations in your area.

Best results are obtained when product is applied to young succulent weeds that are actively growing. Application rates lower than recommended will be satisfactory on susceptible annual weeds. For perennial weeds and conditions such as the very dry areas of the western states, where control is difficult, the higher recommended rates should be used. When SEE® 2,4-D is used for weed control in crops, the growth stage of the crop must be considered.

Some plants and weeds, especially woody varieties, are difficult to control and may require repeat applications. Application rates should be 1 to 5 gallons of total spray by air or 5 to 25 gallons by ground equipment unless otherwise directed. In either case, use the same amount of SEE® 2,4-D recommended per acre. For crop uses, do not mix with oil, surfactants, or other adjuvants unless specifically recommended on label. To do so may reduce herbicide's selectivity and could result in crop damage.

Aerial application should be used only when there is no danger of drift to susceptible crops. Many states have regulations concerning aerial application of 2,4-D formulations. Consult local regulatory authorities before making applications.

BEST AVAILABLE COPY

6 4 11

Although SEE® 2,4-D is a low volatile formulation, at temperatures above 90°F, vapors may damage susceptible plants nearby.

Because coarse sprays are less likely to drift than fine, do not use equipment (such as hollow cone small orifice nozzles) or conditions (such as high pressure) that produce such sprays.

Product should not be allowed to come into contact with desirable susceptible plants such as beans, cotton, fruit trees, grapes, legumes, ornamentals, peas, tomatoes, and other vegetables. Product should not be used in greenhouses. Excessive amounts of 2,4-D in the soil may temporarily inhibit seed germination and all plant growth.

Users should note that herbicide treatment of public water 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 in your state. If stored below freezing, warm this product to 40°F and agitate before using. This does not affect the efficiency of the product.

Spray equipment used to apply 2,4-D should not be used for any other purpose until thoroughly cleaned with a suitable chemical cleaner.

Spray Preparation: Add the recommended amount of product to approximately one-half the volume of water to be used for spraying. Agitate well, then add the remainder of the water. Continue agitation during application until spray tank is empty.

USE IN LIQUID NITROGEN FERTILIZER: SEE® 2,4-D is specially formulated to be combined with liquid nitrogen fertilizer suitable for foliar application on corn, grass, pastures, or small grains in one operation. Use SEE® 2,4-D according to directions on this label for those crops. Use liquid fertilizer at rates recommended by supplier or extension service specialist. Mix SEE® 2,4-D and fertilizer according to the following instructions:

Fill the spray tank approximately 1/2 full with the liquid fertilizer. Add SEE® 2,4-D while agitating the tank. Add the remainder of the liquid fertilizer while continuing to agitate. Application should be made immediately, maintaining agitation until tank is empty. **DO NOT APPLY DURING COLD (NEAR FREEZING) WEATHER.** Spray mixture may not be stored.

WHERE TO USE

SEE® 2,4-D is used to control broad-leaved weeds in cereal crops, corn, sorghum, weeds and brush in rangeland, pastures, rights-of-way, similar non-crop uses, and for aquatic weed control.

PLANTS CONTROLLED

When used properly, product will kill or control the following, in addition to many other noxious plants susceptible to 2,4-D:

BEST AVAILABLE COPY

Alligatorweed
 Arrowhead
 Artichoke
 Bindweed (hedge)
 (field and
 European)
 Bitter wintercress
 Boxelder
 Buckhorn
 Bull thistle
 Bulrush
 Burdock
 Bur ragweed
 Buttercup
 Catnip
 Chickweed
 Chickory
 Cocklebur
 Coffeebean
 Creeping jenny
 Curly indigo
 Dandelion
 Dock
 Duckweed
 Elderberry
 Goldenrod
 Ground ivy
 Hemp
 Hoary cress
 Honeysuckle
 Indigo

Ironweed
 Jimson weed
 Lambsquarters
 Locoweed
 Mexican weed
 Morningglory
 Mustard
 Parrotfeather
 Pennywort
 Pigweed
 Plantain
 Pokeweed
 Povertyweed
 Puncturevine
 Purslane
 Rush
 Russian thistle
 Sagebrush
 Shepherdspurse
 Sowthistle
 Stinkweed
 Sumac
 Sunflower
 Virginia creeper
 Waterhyacinth
 Waterlily
 Water primrose
 Wild lettuce
 Wild radish
 Willow

CROPS

Small grains not underseeded with a legume (barley, oats, wheat, rye): See table for recommended use rates.

Spray when weeds are small after grain begins tillering but before boot stage (usually 4 to 8 inches tall). Do not apply before the tiller stage nor from early boot through milk stage. To control large weeds that will interfere with harvest or to suppress perennial weeds, preharvest treatment can be applied when the grain is in the dough stage. Best results will be obtained when soil moisture is adequate for plant growth and weeds are growing well.

Spring Planted Oats: Use 1/2 pint per acre in sufficient water to give good coverage. Apply after the fully tillered stage, except during the boot to dough stage.

Fall Planted Oats: Apply 1/4 to 1 1/4 pints per acre after full tillering but before early boot stage. Some difficult weeds may require higher rates (3/4 to 1 1/4 pints per acre) for maximum control, but crop injury may result. Do not spray during or immediately following cold weather.

Note: Oats are less tolerant to 2,4-D than wheat or barley and more likely to be

8 03 11
injured. Do not forage or graze treated grain fields within 2 weeks after treatment with 2,4-D. Do not feed treated straw to livestock.

Corn: See table for recommended use rates.

Preemergence: Apply SEE® 2,4-D from 3 to 5 days after planting but before corn emerges. Do not use on very light, sandy soils. Use the higher rates on heavy soils. Plant corn as deep as practical.

Post Emergence: Best results are usually obtained when weeds are small and corn is 4 to 18 inches tall. When corn is over 8 inches tall, use drop nozzles. Do not apply from tasseling to dough stage. If corn is growing rapidly and temperature and soil moisture content is high, use 1/2 pint per acre rate to reduce possibility of crop damage. Delay cultivation for 8 to 10 days to prevent stalk breakage due to temporary brittleness caused by 2,4-D. Application rates of up to 1 pint/acre may be used to control some hard to control weeds. However, the possibility of injury to the corn is increased.

If corn is over 8 inches tall, use drop nozzles to keep spray off corn foliage as much as possible. Do not use with atrazine, oil or other adjuvants. Since the tolerance to 2,4-D of individual hybrids varies, consult your local Extension Service, Agricultural Experiment Station, or University Weed Specialist for information.

Pre-Harvest: After the hard dough or denting stage, apply 1 to 2 pints per acre of SEE® 2,4-D by air or ground equipment to suppress perennial weeds, decrease weed seed production, and control tall weeds such as Bindweed, Cocklebur, Dogbane, Jimsonweed, Ragweed, Sunflower, Velvetleaf, and vines that interfere with harvesting. Do not forage or feed corn fodder to livestock for 7 days following application.

Sorghum (Milo): See table for recommended rate.

Apply to sorghum when crop is 4 to 12 inches high with secondary roots well established. Use drop nozzles when crop is over 10 inches high. Do not apply from flowering to dough stage. Rates of up to 1 pint per acre may be used to control some hard to control weeds. However, the chance of crop injury is increased with the higher rates. Do not use with oil. Use lower rate if conditions of high temperature and high soil moisture exist.

Sugarcane: Use 1 quart per acre as a preemergence application before canes appear or 2 quarts per acre as a blanket spray after cane emerges and through layby, to aid in the control of Johnsongrass seedlings and susceptible broadleaf weeds.

Ornamental Turf: Use 1 to 3 pints of SEE® 2,4-D in enough water to give good coverage to one acre on established stands of perennial grasses, depending on type of weeds and stage of growth. Do not use on creeping grasses such as Bent except for spot spraying. Newly seeded turf should not be treated until after the second mowing and the lower dosage rate should be used.

BEST AVAILABLE COPY

Q 4 11

NOTES FOR ALL TURF SITES (EXCLUDING SOD FARMS):

Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment areas until spray has dried.

The maximum number of broadcast applications per treatment site is 2 per year.

When using this product, wear long-sleeved shirt, long pants, socks, shoes, and chemical-resistant gloves.

After using this product, rinse gloves before removing, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed skin with soap and water. Remove saturated clothing as soon as possible and shower.

Grass Seed Crops: Apply 1 to 4 pints of SEE® 2,4-D in the Spring or Fall to control broadleaf weeds in grass being grown for seed. Do not apply from early boot to milk stage. Spray seedling grass only after the five leaf stage, using 3/4 to 1 pint per acre to control small seedling weeds. After the grass is well established, higher rates of up to 4 pints can be used to control hard to kill annual or perennial weeds. For best results, apply when soil moisture is adequate for good growth. Do not use on Bent unless injury can be tolerated. Do not graze dairy cattle within 7 days of application. Do not apply this product within 30 days of cutting grass for hay. Remove meat animals from treated areas 3 days prior to slaughter.

Fallow Land: On established perennial species such as Canada thistle and Field bindweed, apply up to 3 quarts of SEE® 2,4-D per acre. For annual broadleaf weeds, apply 1 to 2 quarts per acre. Do not plant any crop for 3 months after treatment.

Established Pastures and Rangelands: Use 1 to 4 pints in sufficient water to give good coverage to one acre depending on type of weeds and stage of growth. Use only on established stands of perennial grasses. Do not graze dairy cattle within 7 days of application. Do not apply this product within 30 days of cutting grass for hay. Remove meat animals from treated areas 3 days prior to slaughter.

General Weed Control: (Airfields, Roadsides, Vacant Lots, Drainage Ditch Banks, Fence Rows, Industrial Sites and similar areas): Use 1 to 3 quarts of SEE® 2,4-D per acre. Usually 2 quarts per acre will give adequate control. Do not use on herbaceous ground covers or creeping grass such as Bent. Legumes will usually be damaged or killed. Deep-rooted perennials may require repeat applications. Do not use on freshly seeded turf until grass is well established. Delay reseeding for 30 days.

Woody Plant Control: To control woody plants susceptible to 2,4-D such as Alder, Buckbrush, Elderberry, Sumac, and Willow on non-crop areas, use 2 to 3 quarts of SEE® 2,4-D per acre in 100 gallons of water. Wet all parts of the plants thoroughly, including stem and foliage, to the point of run off. Higher volumes of up to 400 gallons per acre are necessary where the brush is very dense and over 6 to 8 feet high. Applications are more effective when made on actively growing plants. Treatment should not be made during time of severe drought or in early Fall when

BEST AVAILABLE COPY

leaves lose their green color. Hard to control species may require re-treatment next season.

USES IN FOREST MANAGEMENT

Conifer Release: For control of alder, apply 1/2 to 2 quarts of SEE® 2,4-D per acre in 8 to 25 gallons of water, and apply as a foliage spray between mid-May and mid-June.

For control of madrone, manzanita, oak, tanoak and similar species to release hemlock, spruce, and firs, apply 3 quarts of SEE® 2,4-D per acre in 8 to 25 gallons of water, just prior to or during budbreak of Douglas fir.

After northern conifers, jack pine, red pine, black spruce, and white spruce cease growth and "harden off" in late summer, a spray of 1/2 to 3 quarts of SEE® 2,4-D in 8 to 25 gallons of water per acre may be applied by air to control certain competing hardwood species such as alder, aspen, birch, hazel and willow. Since this treatment may cause occasional conifer injury, do not use if such injury cannot be tolerated. Consult your regional or extension forester or state herbicide specialist for recommendations to fit local conditions.

For control of hazel brush and similar species in the Lake States area, apply 2 quarts of SEE® 2,4-D per acre in 8 to 25 gallons of water, when new shoot growth of Hazel is complete.

Site Preparation: (As Budbreak Spray) - For control of alder prior to planting seedlings, apply 2 to 4 quarts of SEE® 2,4-D per acre in 8 to 25 gallons of water, after alder budbreak but before foliage is 1/4 full size.

(As foliage Spray) - For control of alder prior to planting seedlings apply 2 quarts of SEE® 2,4-D per acre in 8 to 25 gallons of water, after most alder leaves are full size.

AQUATIC APPLICATIONS

For Aquatic Weeds in Lakes, Ponds, Drainage Ditches, and Marshes: Use 2 1/2 to 4 1/2 pints of SEE® 2,4-D in 50 to 100 gallons of water per acre. Spray to wet foliage thoroughly. Application should be made when leaves are fully developed above the water line and plants are actively growing. Your State Conservation Department of Game and Fish Commission will assist you in determining the best time and rate for application under local conditions.

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 and kill fish.

Perennial and other hard to control weeds may require a repeat application to give adequate control.

BEST AVAILABLE COPY

11 9 11

RECOMMENDED RATES OF SEE® 2,4-D PER ACRE**

| CROP (SEE DETAILED INSTRUCTIONS ABOVE) STATES* | RATE, AVERAGE CONDITIONS | RATE, DRY CONDITIONS AS IN WESTERN |
|---|---------------------------------|---|
|---|---------------------------------|---|

Small Grains (Wheat, Barley, Rye):

Annual Weeds

1/2 to 1 pint

1 to 2 pints

Perennial Weeds

1 pint

1-1/4 to 2 pints

Preharvest

1 to 2 pints

Oats:

Spring

1/2 pint

Fall

1/2 to 3/4 pint

Corn:

Preemergent

1 to 2 quarts

Postemergent

1/2 pint

1/2 to 3/4 pint

Preharvest

1 to 2 pints

Sorghum (Milo):

Postemergent

1/2 pint

1/2 to 3/4 pint

*Arizona, Idaho, Montana, Oregon, Utah, Washington, Wyoming

**If band treatment is used, base the dosage rate on the actual area sprayed.

Manufactured by:

AGROLINZ, INC.

6525 Quail Hollow, Suite 107

Memphis, TN U.S.A. 38120-1309

Phone (901) 756-4422

