

46146-5

07/01/2004

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUL - 1 2004

Mr. Morris Gaskins  
Registration Agent  
For Atanor S.A.  
Albarelllos 4914  
(B1605AFR) Munro, Argentina

Dear Mr. Gaskins:

SUBJECT: Technical 2,4-D Low Volatile Ester  
EPA Registration No. 46146-5  
Application and Letter Dated June 7, 2004, Request To  
Amend Registration Revised Basic Confidential  
Statement of Formula (CSF) Dated June 7, 2004; To  
Change the Source of the Active Ingredient  
and Revise the Label of This Pesticide Product;  
Request Regarding Product Chemistry Studies and  
Contact Chemist

The subject revised CSF submitted on EPA Form 8570-4 and dated June 7, 2004 has been reviewed and found to be acceptable as an amendment to this pesticide product registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended. The new basic CSF replaces all previously accepted basic or alternate CSFs of record for this pesticide product. The revised CSF has been placed in this Agency's file for the subject pesticide product registration.

The proposed revised label for Technical 2,4-D Low Volatile Ester has been reviewed and is accepted under FIFRA, as amended, provided that you submit a final copy of the label prior to shipment of this pesticide product under this label. A stamped copy of the label is enclosed for your records.

Enclosed listing of required product chemistry studies required of applications to amend product chemistry of pesticide products will be helpful. You must follow the study guidelines.

Sincerely yours,

JS/

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505C)

Enclosures (2)

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ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
Jul - 1 2004

# TECHNICAL 2,4-D LOW VOLATILE ESTER

FOR MANUFACTURING PURPOSES ONLY  
NOT FOR RESALE

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

**ACTIVE INGREDIENT:**  
2-ethylhexyl ester of 2,4-dichlorophenoxyacetic acid ..... 93.30%  
**INERT INGREDIENTS:** ..... 6.70%  
**TOTAL:** ..... 100.00%

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Equivalent to 62.12% 2,4-dichlorophenoxyacetic acid or 6.0 lb./gal. Isomer Specific by AOAC Method 978.05.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See side panel for additional Precautionary Statements and Statement of Practical Treatment.

**NET CONTENTS:**

EPA REG. NO. 46146-5      EPA Est. No. 42750-MO-001

**MANUFACTURED FOR:**  
Atanor S.A.  
Munro, Argentina

**READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.**

## PRECAUTIONARY STATEMENTS

### Hazards to Human and Domestic Animals

**CAUTION:** Harmful if swallowed or absorbed through skin. Prolonged or-frequently repeated skin contact may cause allergic skin reactions in some individuals.

Avoid breathing vapors. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling. When handling the product, wear chemical resistant gloves. Remove and wash contaminated clothing before reuse.

### FIRST AID

<b>IF IN EYES:</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>IF ON SKIN:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>IF SWALLOWED:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li></ul>
<b>IF INHALED:</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment advice.

## ENVIRONMENTAL HAZARDS:

This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

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

Formulators using this product are responsible for obtaining EPA registration of their formulated product.

## ONLY FOR FORMULATION INTO A HERBICIDE FOR THE FOLLOWING USES:

- 1) **Agricultural:** (Corn, Sorghum, Wheat, Pasture, Rangeland, Small Grains, Grasses, and Forestry Site Preparation.) **Industrial Uses. Residential and Turf Uses:** (including, but not limited to golf courses, residential/domestic, commercial, industrial, ornamental and institutional sites.)
- 2) Uses for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.
- 3) Uses for experimental purposes that are in compliance with U.S. EPA requirements.

This product can only be used to formulate pesticide products if the labeling contains the following information and/or revised use directions. All products manufactured for residential, and turf uses, after June 15, 1994, must contain the revised label language below. All other products (i.e., agricultural and industrial), manufactured after October 23, 1993, must bear the revised label language below. All products released for shipment on or after October 1, 2005 must bear revised labeling complying with the maximum application rates for general non-crop sites; tree, brush and woody plant control on rights-of-way; and forestry use patterns other than site preparation, if registered for such uses.

## GENERAL REQUIREMENTS FOR END-USE PRODUCT LABELING

Containers over 1 gallon and less than 5 gallons in capacity must bear the following statement: "Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."

Containers of 5 gallons or more in capacity must also bear the following statement: "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."

## SPECIFIC REQUIREMENTS FOR END-USE PRODUCT LABELING

### 1. FOR AGRICULTURAL USES

- a) **Clothing Requirement Statements:** "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, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."
- b) **Personal Hygiene Statements:** "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 eating, smoking or drinking. Wash hands and arms before using toilet. After work, remove all clothing and shower using soap and water. Do not reuse clothing worn during the previous days 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."

- c) The maximum application rate to pasture and rangeland is the lower of 1) existing application rate on currently registered label or 2) two pounds 2,4-D acid equivalent per acre per application per site.
- d) The maximum application rate to forestry site preparation is the lower of 1) existing application rate on currently registered label or 2) four pounds 2,4-D acid equivalent per acre per application per site. The maximum application rate to all forestry sites is the lower of 1) existing application rate on currently registered label or 2) 4 pounds 2,4-D acid equivalent per acre per application site.
- e) A reentry interval is required and should be in accordance with the Worker Protection Standards, 40 CFR Parts 156 and 170.

## 2. FOR INDUSTRIAL and NON-CRP USES

- a) **Clothing Requirement Statements:** "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, long-sleeved shirt, long pants, socks and shoes. It is recommended that safety glasses include front, brow and temple protection. For aerial applicators in an enclosed cockpit and applicators applying this product from a tractor that has a completely enclosed cab, eye protection is not required."
- b) **Personal Hygiene Statements:** "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 eating, smoking or drinking. Wash hands and arms 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."
- c) The maximum application rate to general non-crop sites is the lower of 1) existing application rate on currently registered label or 2) 2 pounds for 2,4-D acid equivalent per acre per application site. The maximum non-crop application for tree, brush and woody plant control on rights-of-way is the lower of 1) existing application rate on currently registered label or 2) 4 pounds of 2,4-D acid equivalent per acre per application site. The maximum seasonal application rate to non-crop sites is 4 pounds 2,4-D acid equivalent per acre per application site.

## 3. FOR RESIDENTIAL AND TURF USES

- a) **Clothing Requirement Statements:** 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes." 2) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other noncommercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid sodium salt and ester products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: when using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves" 3) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other noncommercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course; acid, sodium salt and ester products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection.
- b) **Personal Hygiene Statements:** 1) For All Granular Products: "After using this product, remove clothing and launder separately before reuse, and promptly and thoroughly wash hands and exposed

skin with soap and water."; 2) For All Liquid Products: "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."

- c) The maximum application rate to turf is the lower of: 1) existing application rate on currently registered label or 2) two pounds 2,4-D acid equivalent per acre per application per site. The maximum number of broadcast applications per treatment site is 2 per year.
- d) The following reentry statement must be included: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treatment area until spray has dried or dust has settled."

### **STORAGE & DISPOSAL**

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

**STORAGE:** Store in original container.

**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:** 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.

### **LIMITED WARRANTY.**

Manufacturer warrants that the chemical composition conforms to the ingredient statement given on the label and that this product is suited for the labeled use when applied according to label directions. Because of widely varying use conditions, it is impossible to eliminate all risks even when label directions are followed.

**EXCLUSIONS OF OTHER WARRANTIES AND REMEDIES:** Except where such disclaimers and exclusions are specifically prohibited by applicable law. THE FOREGOING IS THE ONLY GUARANTEE OR WARRANTY APPLICABLE TO THIS PRODUCT AND IS GIVEN EXPRESSLY AND IN LIEU OF ALL OTHER WARRANTIES EXPRESSED OR IMPLIED, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND ALL SUCH WARRANTIES WHICH EXCEED OR DIFFER FROM SAID LIMITED WARRANTY ARE DISCLAIMED BY MANUFACTURER, and, upon Manufacturer's compliance with said limited warranty. BUYER SHALL HAVE NO REMEDY AGAINST MANUFACTURER FOR ANY TYPE OF DAMAGE OR LOSS, and, IN NO EVENT SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL DAMAGE OR LOSS.