

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

AN

MAR 30 1994

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Nancy Huebl SANDOZ AGRO INC. 1300 EAST TOUHY AVE DES PLAINES, IL 60018

Subject:

Label Amendment Submission of 12/08/93 in Response to PR Notice 93-7

EPA Reg. No. 55947-7 MONDAK HERBICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

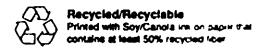
WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

- BEFORE selling or distributing any product bearing the final printed labeling AND
- WITHIN one year from date of this acceptance.



Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs (7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL)
Office of Pesticide Programs
Room 266A, Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

Sincerely,

Jim Tompkins, Deputy Chief Registration Support Branch Registration Division (7505W)

Attachment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division

Nancy Huebl SANDOZ AGRO INC 1300 EAST TOUHY AVE DES PLAINES IL 60018

Comment for: EPA Reg Nr.55947-7
MONDAK HERBICIDE

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Remove the statement "Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box.

Delete the crossed-out statements on your proposed label. They are redundant statements or phrases.

MonDak® Herbicide

For Commercial or Agricultural Use Only

ACTIVE INGREDIENTS:	
Dimethylamine salt of dicamba	
(3,6-dichloro-o-anisic acid)	16.0%
Dimethylamine salt of related acids	4.0%
Dimethylamine salt of 2-methyl-4-	
chlorophenoxy-acetic acid	32.6%
INERT INGREDIENTS:	
TOTAL	100.0%

Contains:

1.25 Pounds Per Gallon Dicamba

2.50 Pounds Per Gallon MCPA

SHAKE WELL BEFORE USING READ THE LABEL FOLLOW DIRECTIONS

Keep Out of the Reach of Children

DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detaile. (If you do not understand the label, find someone to explain it to you in detail.)

STATEMENT OF PRACTICAL TREATMENT

If in eyes, flush with water for 15 minutes.

See Back Panel for additional precautionary statements.

ACCEPTED
with COMMENTS
In EPA Letter Dated

Net Contents: 2 1/2 Gallons
EPA Reg. No. 55947-7

EPA Est. No. 37507-MT-01

MAR 30 1994
Under the Federal Insecticide,
Fundicide, and Rodenticide Act
as assended, for the pesticide
registered under EPA Reg. No.

SANDOZ AGRO, INC. 1300 EAST TOUHY AVE. DES PLAINES, IL 60018

CONTAINER/HMONDAKA.93B

DECEMBER 1993

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive, causes eye damage. Do not get in eyes, or on clothing. Wear goggles or face-shield when handling. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

If in eyes, flush with water for 15 minutes Get medical attention.

If swallowed, drink 1 or 2 glasses of water and induce vomiting by sticking finger down back of throat. Never induce vomiting or give anything by mouth to an unconscious person.

If on skin, wash with plenty of soap and water. Get medical attention

Personal Protective Equipment:

WPS USES:

Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

NON-WPS USES:

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear:

Protective eyewear



Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations:

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

Keep out of lakes, streams or ponds. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

BEST AVAILABLE COPY

3

Apply this product only as directed on the label.

IMPORTANT

Do not apply MONDAK® herbicide directly to or allow spray drifts to come in contact with vegetables, flowers, grapes, tomatoes, potatoes, sugar beets, beans, or other desirable plants. (Coarse sprays are less likely to drift.). Do not contaminate domestic or irrigation water. Do not store in direct contact with fertilizer, seed, insecticides or fungicides. Thoroughly clean spray equipment with a suitable chemical cleaner before using for other purposes. When container is empty, immediately wash thoroughly and destroy. Do not graze treated areas or harvest for dairy feed prior to crop maturity. Do not apply (except as recommended) or clean equipment on or near desirable trees or other plants, or on areas where roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.

DIRECTIONS FOR USE

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

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

PPE required 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 is:

- Coveralls
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

STORAGE AND DISPOSAL

PROHIBITIONS

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

STORAGE

Store in original container in a well ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granules, sawdust or other equivalent material for disposal.

PESTICIDE DISPOSAL

Triple rinse pesticide from containers and use rinsates-in the pesticide application. Wastes which cannot be used according to label instructions may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Plastic or Metal: After triple rinsing (or equivalent), offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

LIMITED WARRANTY AND LIABILITY

NOTICE: Read this Limited Warranty and Liability before buying or using this product. If the terms are not acceptable, return it at once unopened.

It is critical that this product be used and mixed only as specified on the label. The laws of a State may make some or all of this paragraph inapplicable or may give you rights in addition to your rights hereunder. Except, to the extent prohibited by applicable law, the exclusive remedy of the user or buyer and the limit of liability of this Company or any other Seller for any and all losses, personal injuries or damages resulting from the use of this product, shall be the purchase price paid by the user or buyer for the quantity of product involved. Except to the extent prohibited by State law, there is no warranty, and this Company and other Sellers disclaim all liability for losses, personal injury or damages: (i) arising from any use of this product in a manner or for a purpose not recommended in its label directions, or from mixing this product before use with any substance except as recommended by the product's label, (ii) arising from handling or storage in violation of label instructions, (iii) for all indirect, special or consequential damages, (iv) when not reported to this Company within one year of discovery, and (v) arising from product not used within the label-designated shelf life of four years from date of purchase, whichever first occurs. THERE ARE NO IMPLIED WARRANTIES AND NO WARRANTIES OF MERCHANTABILITY OR FITNESS.

MonDak® Herbicide

For Commercial or Agricultural Use Only

ACTIVE INGREDI	ENTS:	
	nine salt of dicamba	_
(3,6-dichlo	ro-o-anisic acid)	6.0%
Dimethylamine salt of related acids		
-	nine salt of 2-methyl-4-	
chlorophenoxy-acetic acid		
	NTS: 4	
TOTAL		00.0%
Contains:	1.25 Pounds Per Gallon Dicamba	
	2.50 Pounds Per Gallon MCPA	

READ THE LABEL FOLLOW DIRECTIONS

Keep Out of the Reach of Children

DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

STATEMENT OF PRACTICAL TREATMENT

If in eyes, flush with water for 15 minutes.

See Back Panel for additional precautionary statements.

Net Contents: 2 1/2 Gallons EPA Reg. No. 55947-7 EPA Est. No. 37507-MT-01

BEST AVAILABLE COPY

SANDOZ AGRO, INC. 1300 EAST TOUHY A\ E. DES PLAINES, IL 60018

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER

Corrosive, causes eye damage. Do not get in eyes, or on clothing. Wear goggles or face shield when handling. Harmful if swallowed. Wash thoroughly With soap and water after handling. Remove contaminated clothing and wash before reuse.

STATEMENT OF PRACTICAL TREATMENT

If in eyes, flush with water for 15 minutes Get medical attention.

If swallowed, drink 1 or 2 glasses of water and induce vomiting by sticking finger down back of throat. Never induce vomiting or give anything by mouth to an unconscious person.

If on skin, wash with plenty of soap and water. Get medical attention

Personal Protective Equipment:

WPS USES:

Applicators and other handlers who handle this pesticide for any use covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear:

- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

NON-WPS USES:

Applicators and other handlers who handle this pesticide for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) -- in general, agricultural-plant uses are covered -- must wear:

Protective eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering controls statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations: Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clear clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

Keep out of lakes, streams or ponds. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

Apply this product only as directed on the label.

IMPORTANT

Do not apply MONDAK® herbicide directly to or allow spray drifts to come in contact with vegetables, flowers, grapes, tomatoes, potatoes, sugar beets, beans, or other desirable plants. (Coarse sprays are less likely to drift.). Do not contaminate domestic or irrigation water. Do not store in direct contact with fertilizer, seed, insecticides or fungicides. Thoroughly clean spray equipment with a suitable chemical cleaner before using for other purposes. When container is empty, immediately wash thoroughly and destroy. Do not graze treated areas or harvest for dairy feed prior to crop maturity. Do not apply (except as recommended) or clean equipment on or near desirable trees or other plants, or on areas where roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.

DIRECTIONS FOR USE

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

For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 48 hours.

PPE required 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 is:

- Coveralis
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

WHEAT (not underseeded to legumes)

For the control of "hard to kill" weeds (phenoxy resistant) including:

Bedstraw Henbit

Corn cockle Knawel (German moss)

Cow cockle

Corn buttercup (crowfoot)

Dogfennel

Ladysthumb

Miners lettuce

Prickly lettuce

Fiddleneck (tarweed)

Gromwell

Wild buckwheat

And for control of other broadleaf weeds including:

Canada thistle (top growth)

Cocklebur

Perennial Sowthistle
(top growth)

Dandelion Pigweed (redroot)

Dragonhead (mint) Puncturevine

Field pennycress (fanweed) Ragweed (common)

Field pepperweed Russian thistle
Hempnettle Shepherdspurse

Knotweed Sunflower
Kochia Vetch
Lambsquarters Wild radish
Mustard (annual) and others

For ground application use 5 to 20 gallons of water per acre. For aerial application use 3 to 5 gallons of water per acre.

Spring Seed Wheat: For the control of the listed weeds, apply 0.8 pint of MONDAK® herbicide (1/8 pound of dicamba plus 1/4 pound of MCPA) per acre. One gallon of MONDAK® herbicide treats 10 acres. Apply as a foliar spray when the wheat is in the 2 to 5 leaf stage.

Fall Seeded Wheat: For control or suppression of the listed weeds, apply 0.8 to 1.2 pints of MONDAK® herbicide (1/8 to 3/16 pound of dicamba plus 1/4 to 3/8 pound of MCPA) per acre. One gallon of MONDAK® herbicide treats 7 to 10 acres. Use the higher rates on hard to kill or more mature weeds. Apply as a foliar spray immediately after winter dormancy and before the wheat begins to joint.

NONCROPLAND USE: (Roadsides, fence rows and similar areas.)

For top growth control of field bindweed, Canada thistle, perennial sowthistle, Russian knapweed and leafy spurge, apply 3.2 to 6.4 pints of MONDAK® herbicide (1/2 to 1 pound of dicamba and 1 to 2 pounds of MCPA) per acre. For spot treatment apply 1 teaspoonful of MONDAK® herbicide per 1 to 2 square rods. Apply as a foliar spray to actively growing plants.

GRASS SEED PRODUCTION

(Lawn-type fescues, perennial bentgrasses, perennial ryegrasses, and Kentucky bluegrass.)

FOR USE ONLY IN THE STATES OF IDAHO, OREGON AND WASHINGTON.

Apply to grass stands established at least one year prior to treatment.

For control of:

Corn cockle Henbit
Cornflower Knawel

(Bachelor's button)

Corn spurry

Chickweed

Curly dock

Dandelion

Lambsquarters

Pepperweed

Pineappleweed

Prickly lettuce

Red sorrel

Dogfennel Shepherdspurse
False dandelion Vetch (common)
Field pennycress (tarweed) Wild radish

Filaree

Apply 1 1/2 pints of MONDAK® herbicide (3 3/4 ounces dicamba acid equivalent plus 7 1/2 ounces MCPA acid equivalent) per acre. Apply to early seedling weeds (4" or less in height after winter dormancy up to the early boot stage of the grass. For ground application, use a minimum of 20 gallons of total spray per acre.

STORAGE AND DISPOSAL

PROHIBITIONS

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

STORAGE

Store in original container in a well ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained and absorbed with clay granules, sawdust or other equivalent material for disposal.

PESTICIDE DISPOSAL

Triple rinse pesticide from containers and use rinsates-in the pesticide application. Wastes which cannot be used according to label instructions may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL

Plastic or Metal: After triple rinsing (or equivalent), offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities, such as burning of plastic containers. If burned, stay out of smoke.

LIMITED WARRANTY AND LIABILITY

NOTICE: Read this Limited Warranty and Liability before buying or using this product. If the terms are not acceptable, return it at once unopened.

It is critical that this product be used and mixed only as specified on the label. The laws of a State may make some or all of this paragraph inapplicable or may give you rights in addition to your rights hereunder. Except, to the extent prohibited by applicable law, the exclusive remedy of the user or buyer and the limit of liability of this Company or any other Seller for any and all losses, personal injuries or damages resulting from the use of this product, shall be the purchase price paid by the user or buyer for the quantity of product involved. Except to the extent prohibited by State law, there is no warranty, and this Company and other Sellers disclaim all liability for losses, personal injury or damages: (i) arising from any use of this product in a manner or for a purpose not recommended in its label directions, or from mixing this product before use with any substance except as recommended by the product's label, (ii) arising from handling or storage in violation of label instructions, (iii) for all indirect, special or consequential damages, (iv) when not reported to this Company within one year of discovery, and (v) arising from product not used within the label-designated shelf life of four years from date of purchase, whichever first occurs. THERE ARE NO IMPLIED WARRANTIES AND NO WARRANTIES OF MERCHANTABILITY OR FITNESS.