

OCT 30 1992

Mr. Larry E. Hammond
DowElanco
9002 Purdue Road, Quad III/2
Indianapolis, IN 46268

Dear Mr. Hammond:

Subject: 2,4-Dichlorophenoxy Acetic Acid Flake
EPA Registration No. 62719-25
Application Dated October 29, 1992, Request
To Amend 2,4-D Registrations Final Agreement,
Response to EPA Letter Dated September 30, 1992

The proposed amendments to the labeling of the subject product have been reviewed for compliance with the terms and conditions as reached in the agreement between the Industry Task Force II on 2,4-D Research Data ("Task Force") and this Agency. The amendments are acceptable for registration under Section 3 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) as amended provided that you:

1. Revise Insert 1, second sentence, to read: "All products manufactured for residential and turf uses (excluding sod farms) after....."
2. Revise the specific requirements for end-use product labeling: 1. For Agricultural Uses, and for 2. For Industrial/Aquatic Uses statements regarding aerial applicators. Change the word applications to applicators.
3. Submit five (5) printed copies of the final printed labeling before releasing the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA, Section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely yours,

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

Enclosure

EWilson:Diskette #2,4-D 1:11-18-92

BEST AVAILABLE COPY

3. For Residential And Turf Uses

- 19 25
- a. Clothing Requirement Statements: 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."; 2) For Amine Liquid products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and rubber gloves."; 3) For Amine Liquid Products carrying the "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks shoes, rubber gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection."; 4) For Acid, Sodium Salt and Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; 5) For Acid, Sodium Salt and Ester liquid Products carrying "WARNING" or "DANGER" signal word: "When using this product, wear long-sleeved shirt, long pants, socks shoes, 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) 2 pounds 2,4-D acid equivalent 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 areas until spray has dried or dust has settled."



2,4-Dichlorophenoxy Acetic Acid Flake

Active Ingredient:		
2,4-Dichlorophenoxyacetic acid†	7.0%	
Inert Ingredients.....	3.0%	
Total	100.0%	

† Isomer Specific by AOAC Method No. 6.275-6.279 (13th Ed.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

CAUTION

Harmful If Swallowed, Inhaled Or Absorbed Through The Skin • Causes Eye Irritation • Prolonged Or Frequently Repeated Skin Contact May Cause Allergic Skin Reactions In Some Individuals

Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating or smoking. When handling this product, wear chemical resistant gloves. Remove and wash contaminated clothing before reuse.

First Aid

If in eyes: Flush with plenty of water. Get medical attention if irritation persists.

If on skin: Wash with plenty of soap and water. Get medical attention.

If swallowed: Call 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.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public waters unless this product is specifically identified and addressed in an NPDES permit. 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.

In case of an emergency endangering life or property involving this product, call collect 517-636-4400.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

MADE IN BRAZIL

20539

EPA Reg. No. 62719-25

EPA Est. 464-BR-1

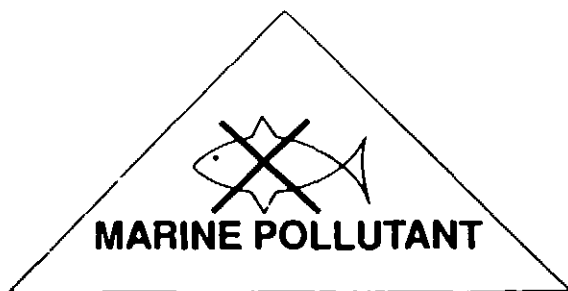
DowElanco • Indianapolis, IN 46268, U.S.A.

Herbicide

Net Weight **55 lb/25 kg**

health or the environment

Not DOT Regulated



ENVIRONMENTALLY
HAZARDOUS SUBSTANCE,
SOLID, N.O.S.
(2,4-dichlorophenoxyacetic acid)
UN 3077

495

STORAGE AND DISPOSAL

Prohibitions: Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.
Storage: Keep container tightly closed when not in use. This product can be stored in an unheated building.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture or residue 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: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.
General: Consult federal, state, or local disposal authorities for approved alternative procedures.

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

For Manufacturing Use Only: For formulation only into end-use products for acceptable use patterns.

Note: Because of their properties and intended uses, formulations containing 2,4-Dichlorophenoxy Acetic Acid Flake may require precautionary labeling differing from that given. Formulators should develop their own use and precautionary labeling, based on the properties and intended uses of their own finished formulations, and in accordance with all pertinent laws and regulations.

Formulators using this product are responsible for obtaining EPA registration for their formulated products. Refer to DowElanco for instructions for formulation and other information.

Insert 1.

Warranty Limitations and Disclaimer

DowElanco warrants that at the time of delivery, the product will conform to its chemical description, on the label, that it will pass without objection in the trade under the contract description, that Seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

This is the only warranty made on this product. DOWELANCO EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. Buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely exclusively on any oral or written statements or representations.

SPANISH

2,4-Diclorofenoxy Acetic Acid Flake

Ingrediente Activo	
Acido 2,4-Diclorofenoxiacético†	97.0%
Ingredientes Inertes	3.0%
Total	100.0%

†Específico al isómero por método AOAC 6.275.-6.279 (Ed. 13)

Declaraciones de advertencia

Riesgos a humanos y a animales domésticos
Manténgase fuera del alcance de los niños

AVISO

Daño si es ingerido, inhalado o absorbido por la piel • Causa irritación de los ojos • El contacto prolongado o frecuente con la piel puede causar reacciones alérgicas de la piel en algunos individuos.

No permita contacto con los ojos, la piel o la ropa. Evite respirar vapores. Lávese completamente con agua y jabón después de usar el producto y antes de comer o fumar.

Al manipular este producto, use guantes resistentes a los químicos. Qútese la ropa contaminada y lávela antes de usarla nuevamente.

Primeros Auxilios

Si entra en los ojos, enjuague con mucha agua. Obtenga atención médica si la irritación persiste.
Si entra en contacto con la piel, lave inmediatamente con mucha agua y jabón. Obtenga atención médica.
Si se ingiere, llámese al médico o al Centro para Control de Envenenamientos inmediatamente. Administre uno o dos vasos de agua e induzca el vómito tocando la parte de atrás de la garganta con un dedo. Si la víctima está inconsciente, no induzca el vómito ni le dé nada por la boca.

Peligros Ambientales

No permita que el desague que contiene este producto entre en lagos, nos, lagunas, estuarios, océanos o aguas destinadas para el uso público, con excepción de los casos en que el producto haya sido identificado específicamente y recibido un permiso NPDES. No permita que el desague que contiene este producto llegue al sistema de alcantarillado sin avisar previamente a las autoridades. Consulte a las autoridades para mayor información.

Producto Químico Agrícola: No se embarque ni se almacene junto con alimentos, pienso, medicamentos o ropa.

PORTUGUESE

2,4-Diclorofenoxy Acetic Acid Flake

Ingrediente Ativo:	
Acido 2,4-Diclorofenoxiacético†	97.0%
Ingredientes Inertes	3.0%
Total	100.0%

†Isómero específico pelo método AOAC número 6.275-6.279 (13ª ed.)

Avisos de precauções

Riscos a seres humanos e animais domésticos
Manter afastado das crianças

ATENÇÃO

Nocivo se ingerido, inalado ou absorvido pela pele • Irrita os olhos • Contato prolongado ou frequente com a pele pode causar reação alérgica da pele em alguns indivíduos

Evite respirar o pó. Evite respirar o vapor. Lave cuidadosamente com sabão e água após manipulação e antes de comer ou fumar. Ao manipular este produto, use luvas resistentes aos químicos. Tire a roupa contaminada e lave antes de tomar a usar.

Pronto Socorro

Se os olhos forem atingidos, lava-os com bastante água. Se a irritação persistir, procure atenção médica.
Se a pele for atingida, lava-la com bastante água e sabão. Procure atenção médica.
Se for ingerido, chamar um médico ou um centro para controle de substâncias tóxicas. Provocar o vómito dando para beber dois copos de água e introduzindo o dedo na garganta. Não se deve dar nada via oral à uma pessoa desacordada.

Riscos Ambientais

Não despejar desaguamentos contendo este líquido em lagos, nos, lagoas, estuários, oceanos ou águas para uso público, a não ser que este produto estiver especificamente identificado e tratado numa autorização do NPDES. Não despejar desaguamentos contendo este produto na rede de esgoto sem antes notificar as autoridades da usina de tratamento de esgoto. Para notificações, dirija-se às autoridades apropriadas.

Produto químico para a agricultura. Não embarque nem armazene junto a carregamentos de alimentos, forragens, produtos farmacêuticos ou roupa.

Revisions:
1) Added general and specific requirements for protective clothing, personal hygiene statements and maximum application rates that must appear on the labeling of 2,4-D-containing end-use products formulated from this manufacturing use product as required by EPA.

Inserts
(2,4-Dichlorophenoxy Acetic Acid Flake)

Insert 1.

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, industrial and aquatic), manufactured after October 23, 1993 must bear the revised label language below.

General Requirements For End-Use Product Labeling

1. Containers over 1 gallon and less than 5 gallons in capacity must bear the following statements:
 Persons engaged in open pouring of this product must also wear coveralls or a chemical resistant apron."
2. 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 Requirements 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 applications 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 the 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 for 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) 2 pounds 2,4-D acid equivalent per acre per application site.
- d. The maximum application rate to forestry site preparation 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/Aquatic Uses

- a. Clothing Requirements 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 applications 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 the 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 for 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."