

10/4

20 NOV 1992

Larry E. Hammond  
DowElanco  
9002 Purdue Road  
Indianapolis, IN 46268-1189

Dear Mr. Hammond:

Subject: Compliance with 2,4-D Exposure Reduction Program  
2,4-D Isooctyl Esters  
EPA Registration No. 62719-26  
Your Submission Dated October 29, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit three (3) final printed copies for the above mentioned label before releasing the product for shipment.

Please note that we acknowledge "2,4-D 2-Ethylhexyl Ester" as a substitute brand name and not the official name for this product. Unless a formal request for a product name change is made, all future correspondences with the Agency regarding this product should reference the official name "2,4-D Isooctyl Esters."

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Fungicide-Herbicide Branch  
Registration Division (H7505C)

Enclosure

CONCURRENCES							
SYMBOL	H7505C						
SURNAME	D. KENNY						
DATE	11/18/92						



PI 1112598

# 2,4-D 2-Ethylhexyl Ester

## Technical

Active Ingredient  
2,4-dichlorophenoxyacetic acid 1,  
isooctyl (2-ethylhexyl) ester ..... 94.4%  
Inert Ingredients ..... 5.6%  
Total ..... 100.0%  
2,4-Dichlorophenoxyacetic Acid 1  
Equivalent: 82.6% - 6.0 lb/gal  
Heavier Specific by AOAC Method  
No. 6275.6279 (13th Ed.)

### Precautionary Statements

Hazards to Humans and  
Domestic Animals  
Keep Out of Reach of Children

### 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

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

If on skin: Immediately flush skin with  
plenty of water. Get medical attention if  
irritation persists.

If swallowed: Do not induce vomiting. Call a  
physician. Do not induce vomiting or give  
anything by mouth to an unconscious person.

### Environmental Hazards

This product is toxic to aquatic invertebrates.  
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 sewerage  
treatment plant authority. For guidance,  
contact your state water board or regional  
office of the Environmental Protection Agency.

### 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.

### STORAGE AND DISPOSAL (Cont.)

Container Disposal (Metal): Do not reuse  
container. Triple rinse (or equivalent).  
Puncture and dispose of in a sanitary landfill,  
or by other procedures approved by state  
and local authorities.

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-D 2-Ethylhexyl Ester 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.

Do not contaminate water used for irrigation  
or domestic purposes. Do not store near  
fertilizers, seeds, insecticides or fungicides.  
Thoroughly clean equipment used with this  
product with a suitable chemical cleaner  
before use for other purposes. Vapors from  
this product may injure susceptible plants in the  
immediate vicinity.

### 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  
good title thereto, and that such  
delivered free from any lawful se-  
lien or encumbrance.

This is the only warranty made by  
DOWELANCO EXPRESSLY DIS-  
IMPLIES WARRANTIES OF MER-  
AND FITNESS FOR A PARTICULAR  
AND, EXCEPT AS SET FORTH IN  
PARAGRAPH, ANY OTHER EXPLI-  
IMPLIES WARRANTIES. Buyer is  
the use of its own independent ex-  
expertise in the selection and use  
product and does not rely on any  
written statements or representa-

Manufacturing Chemical. Do not  
with food, feeds, drugs or clothes.

In case of an emergency ending  
property involving this product, call  
517-836-4400.

20760  
EPA Reg No. 62719-26 EPA

DOT:  
HAZARDOUS SUBSTANCE  
N.O.S. NA9188  
RQ(2,4-D Ester)

ORM-E

Insert 1.

Herbicide

Net Weight 500 lb/272 kg

DowElanco - Indianapolis, IN 46268

BEST AVAILABLE COPY

### Revisions.

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

K19 LABELS US

## **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."

### 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) For Ester Liquid Products carrying "CAUTION" signal word: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves."; 3) For 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."