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

JAN 8 2007

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Diego Fonseca Dow AgroSciences 9330 Zionsville Road Indianapolis, IN 46268-1054

Dear Mr. Fonseca:

Subject: Revised Basic Formula and Labeling MCPA 2-Ethylhexyl Ester Technical EPA Registration No. 62719-64 Your Submission Dated August 25, 2006

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records. The revised basic formula and labeling supersede all previously accepted ones. We note that the formulator's exemption does not cover the currently registered use on peas which is not listed on the source products labeling.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

oanne I. Miller.

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

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(logo) Dow AgroSciences

MCPA 2-Ethylhexyl Ester Technical Herbicide

Active Ingredient:

| 2-methyl-4-chlorophenoxyacetic acid, | |
|--------------------------------------|-------|
| 2-ethylhexyl ester | 97.0% |
| Other Ingredients | |
| Total | |

Acid Equivalent - 2-methyl-4-chlorophenoxyacetic acid, 62.2% - 5.7 lbs/gal

CAUTION

Precautionary Statements

Hazards to Humans and Domestic Animals

Harmful If Swallowed Or Absorbed Through The Skin

Avoid contact with skin, eyes or clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

If swatlowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

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 Pollutant 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 local 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.

For Manufacturing Use Only

Only for formulation into a herbicide for the following uses: wheat, barley, oats, rye, flax, peas, small grains underseeded with alfalfa, clover; lespedeza, trefoil and vetch, pasture, rangeland, grasslands, non-crop agricultural areas, rights-of-way, fencerows and roadsides.

ACCEPTED

JAN 8 2007 Under the Federal Insocticide, Fungicide, and Rodenticide Act as amended, for the posticide registered under EPA Reg. No

62119-64

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Uses for rice and grain sorghum are cancelled. Technical and end-use product labels must be revised to delete all references to and use-directions for these canceled use patterns.

This product may be used to formulate products for any additional use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

Storage and Disposal

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

Storage: Do not store in freezing temperatures. If allowed to freeze, remix before using. Do not transport with or store near fertilizers, seeds, insecticides, or fungicides.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

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.

Warranty Limitations and Disclaimer

Dow AgroSciences 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 Dow AgroSciences 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. Dow AgroSciences 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 on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

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

EPA Reg. No. 62719-64

EPA Est.

Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

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