

19 NOV 1992

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

Dear Mr. Hammond:

Subject: DowElanco/2,4-D Isopropyl Amine Salt
EPA Registration No. 62719-71
Application Dated October 29, 1992, Request
To Amend 2,4-D Registrations Re: 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 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

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PI 2782035

2,4-D Isopropylamine Salt

Active Ingredients:

2,4-dichlorophenoxyacetic acid†, isopropylamine salt	49.9%
Inert Ingredients	50.1%
Total	100.0%

Acid Equivalent:

† 2,4-dichlorophenoxyacetic acid - 39.4% - 3.75 lb/gal	
† Isomer Specific by AOAC Method No. 6.275-6.279, (13th Edition)	

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

DANGER

Corrosive • Causes Eye Damage • May Be Fatal If Absorbed Through Skin • Harmful If Swallowed Or Inhaled

Do not get in eyes, on skin or on clothing. Wear goggles or face shield, protective clothing and chemical resistant gloves. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse.

First Aid

If in eyes: Flush with plenty of water. Get medical attention.
If on skin: Wash with plenty of soap and water. Get medical attention if irritation persists.
If swallowed: Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.
Note to Physicians: Probable mucosal damage may contraindicate the use of gastric lavage.

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 sewerage treatment plant authority. For guidance, contact your state water board or regional office of the EPA.

STORAGE AND DISPOSAL

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

Storage: Keep container tightly closed when not in use.

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 (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 Isopropylamine Salt 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. Be sure that use of this product conforms to all application 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.

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.

In case of an emergency endangering life or property involving this product, call collect 517-836-4400. health o

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

EPA Reg. No. 62719-71
01482

EPA Est. 484-MI-1
900-000703

RO/HAZARDOUS SUBSTANCE
LIQUID N.O.S.
NA9188/(2,4-D Salt)

ORM-E

Lot

Herbicide

Net Contents 55 gal

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

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.

- 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 range land 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."

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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 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."
- 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."