

PM 23

62719-71

09/22/99

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SEP 22 1999

Mr. Larry E. Hammond
Dow AgroSciences LLC
9330 Zionsville Rd.
Indianapolis, IN 46268-1054

Dear Mr. Hammond:

SUBJECT: I. Additional Alternate Confidential Statements of Formula (CSF)
II. Label Amendment Adding Physical and Chemical Hazards Statement, Use Sites and Container Disposal Instructions
2,4-D Isopropylamine Salt Technical
EPA Registration No. 62719-71
Your Submissions Dated August 27, 1999 (Alternate CSFs) and September 20, 1999 (Revised Labeling), as Amended by FAX on September 21, 1999, and September 22, 1999

I. Alternate Confidential Statements of Formula (CSFs):

The Confidential Statements of Formula (CSFs), referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable. Copies of the CSFs (Alternate Formulation #2 and Alternate Formulation #3), dated June 10, 1999, have been placed in our file for the subject product. In addition to these CSFs, the Agency has Basic and Alternate Formulation #1 CSFs, dated April 16, 1999, on file for this product. All other previously submitted CSFs for this product are considered obsolete.

II. Label Amendment:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable, provided you:

1. Correct the typographical error noted in the "Hazards to Humans and Domestic Animals" section. The fourth statement should read "Harmful If Swallowed Or Inhaled."

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed label before you release the product for shipment.

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CONCURRENCES							
SYMBOL ▶	7505C						
SURNAME ▶	S. Stanton						
DATE ▶	Sep 22, 1999						

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The Agency has recently revised its recommended First Aid statements for pesticide products and intends to issue a PR Notice announcing the changes in the near future. In the interim we are encouraging registrants to begin using the new statements. The new statements were developed as part of the Consumer Labeling Initiative in close cooperation with poison control center personnel and other medical experts. While it is not mandatory that you revise your label at this time, you are strongly encouraged to substitute the revised statements (below) for those statements currently on the label at your next label printing

"FIRST AID

If swallowed:	<ul style="list-style-type: none"> • 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 by a poison control center or doctor.
If in eyes:	<ul style="list-style-type: none"> • 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. • Call a poison control center or doctor for treatment advice.
If on skin:	<ul style="list-style-type: none"> • 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.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment."

Sincerely yours,



Joanne I. Miller

Product Manager (23)

Herbicide Branch

Registration Division (7505C)

Enclosure

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(Logo) Dow AgroSciences LLC

2,4-D Isopropylamine Salt Technical

Active Ingredient:

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. 978.05 (15th Ed.)

ACCEPTED
with COMMENTS
In EPA Letter Dated

SEP 22 1999

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

62719-71

DANGER

Precautionary Statements

Hazards to Humans and Domestic Animals

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

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

First Aid

If in eyes: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

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

If swallowed: Call a doctor or get medical attention. Do not induce vomiting or give anything by mouth to an unconscious person. Drink promptly a large quantity of milk, egg whites, gelatin solution, or, if these are not available, drink large quantities of water. Avoid alcohol.

If inhaled: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

Note to Physician: 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 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.

Physical or Chemical Hazards

Do not use or store near heat or open flame.

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

For Formulation Into An Herbicide for Use Only On The Following Crops: corn, Sorghum (milo), small grains (wheat, oats, barley and rye), soybeans (preplant), grass pastures, rangeland, fallow cropland, and Conservation Reserve Programs (CRP) acres, sugarcane, grass seed crops, sod farms, orchard floors (apple, pear, fruit, citrus, and nut); **And For The Following Non-Crop Uses:** turf (including lawns, golf courses, cemeteries, parks, airfields), roadsides, noncropland areas including rights-of-way, railroads, fence rows, tree injection treatments, forest site preparation, forest conifer release and woody plant control in non-cropland areas.

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.

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

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: "Do not open pour product from this container. A mechanical system (such as a probe and pump or spigot) 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 applicators 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.

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- 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 applicators 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 Sites (Excluding Sod Farms)

- a. **Clothing Requirement Statements:** 1) For All Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes." 2) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When using this product, wear long-sleeved shirt, long pants, socks shoes and rubber gloves." 3) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial mixer/loader/applicators when the product is to be applied to a golf course, amine products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "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 protections." 4) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "CAUTION" signal word only must bear the following language: "When mixing, loading, or applying this product, wear long-sleeved shirt, long pants, socks, shoes and chemical-resistant gloves." 5) Products registered for use on residential and other turf sites (excluding sod farms) by commercial mixer/loader/applicators (except when the product is to be applied to a golf course), all products applied in liquid form and carrying "WARNING" or "DANGER" signal word only must bear the following language: "When mixing, loading, or applying 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."

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Storage and Disposal

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

Storage: Keep container tightly closed when not in use. If exposed to subfreezing temperatures, the product should be warmed to at least 40°F and mixed thoroughly before using.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate 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 or Plastic): 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.

General: Consult federal, state, or local disposal authorities for approved alternative procedures.

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 it will be reasonably fit for the uses stated on the label when used in accordance with directions, 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. 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 exclusively 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. If you wish to obtain additional product information, visit our web site at www.dowagro.com.

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

EPA Reg. No. 62719-71

EPA Est. 464-MI-1

Produced for:

Dow AgroSciences LLC • Indianapolis, IN 46268 USA

Herbicide**Net Contents __ gal**