

NOV 2 1998

Larry E. Hammond
 Dow AgroSciences LLC
 9330 Zionsville Road
 Indianapolis, IN 46268

Dear Mr. Hammond:

Subject: Revised Labeling and Confidential Statement of Formula;
 Revise Active Ingredient to 71%
 TIP4-4 Herbicide
 EPA Registration No. 62719-180
 Your Submissions Dated August 5, 1997 and July 29, 1998

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

- 1) Add the word "Corrosive" to the beginning of the Precautionary Statements so that it immediately precedes the statement "Causes irreversible eye damage."
- 2) Revise the statements currently reading "Do not get in eyes. Avoid contact with eyes, skin, or clothing" in the Precautionary Statements to read "Do not get in eyes or on clothing. Avoid contact with skin."
- 3) Revise the eye statement in the Statement of Practical Treatment to read "If in eyes: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. Get medical attention."
- 4) Revise the oral statement in the Statement of Practical Treatment to read "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."
- 5) Add a note to physician at the end of the Statement of Practical Treatment to read "Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage."
- 6) Within the Storage and Disposal block, revise the first sentence under Pesticide Disposal so that it reads "Pesticide wastes are acutely hazardous."

DK: 305-7546:HB/PM23

		CONCURRENCES						
SYMBOL	T505C							
SURNAME	D. KENNY							
DATE	11/2/98							

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A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

The Agency has also reviewed your submission for the revised Confidential Statement of Formula dated July 9, 1998 for the basic formulation. It has been determined that the Confidential Statement of Formula agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The Confidential Statement of Formula has been added to your file as part of the record.

Sincerely yours,

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

)
Enclosure

)

(Label)

TIPA-4

Active Ingredient:

2,4-dichlorophenoxyacetic acid†, triisopropanolamine salt	68.1-71.0%
Inert Ingredients	31.9-29.0%
Total	100.0%

Acid Equivalent:

†2,4-dichlorophenoxyacetic acid - 96.5-38.1% - 3.8 lb/gal

†Isomer Specific by AOAC Method No. 978.05, 15th Ed.

Keep Out Of Reach Of Children

DANGER

Precautionary Statements

Hazards to Humans and Domestic Animals

~~Keep Out Of Reach Of Children~~

DANGER

Causes Irreversible Eye Damage • Harmful If Swallowed, Inhaled, Or Absorbed Through Skin

Do not get in eyes. Avoid contact with eyes, skin, or clothing. Avoid breathing vapors. Wear goggles or face shield and chemical resistant gloves when handling. 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. Call a physician.

If swallowed: Call a physician or Poison Control Center. Drink 1 to 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.

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

Environmental Hazards

This product is toxic to aquatic invertebrates. 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 cut or weld container.~~

ACCEPTED
with COMMENTS
In EPA Letter Dated

NOV 2 1998

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

62719-180

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal. Open dumping is prohibited.

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: 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: Do not reuse container. 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.

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 An Herbicide for Use Only On The Following Crops: corn, Sorghum (milo), small grains (wheat, oats, barley and rye), rice, soybeans (preplant), sugarcane, grass pastures, rangeland, fallow cropland, areas in the conservation reserve program, grass seed crops, 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.

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

Note: Because of their properties and intended uses, formulations containing triisopropanolamine salt of 2,4-dichlorophenoxyacetic acid 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.

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.
- 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."

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 on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call collect 517-636-4400.

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

EPA Reg. No. 62719-180

EPA Est. 464-MI-1

DowElanco • Indianapolis, IN 46268 USA

EPA Accepted: __/__/__

Herbicide

Net Weight