

9/10/92

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

Dear Mr. Hammond:

Subject: DowElanco/2,4-D Acid 85WP Herbicide
EPA Registration No. 62719-231
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 "For Manufacturing Use Only", Third 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 2:11-18-92

BEST AVAILABLE COPY

VZL.

D. Wilson

(Mfg. Use Label)

2,4-D Acid 85WP

Herbicide

Active Ingredient(s):

2,4-Dichlorophenoxyacetic acid†	85.0%
Inert Ingredients	15.0%
Total	100.0%

2,4-Dichlorophenoxyacetic Acid† Equivalent: 85.0%

†Isomer Specific by AOAC Method No. 6.275-6.279 (13th Ed.)

Precautionary Statements

Hazards to Humans and Domestic Animals

Keep Out of Reach of Children

DANGER

Corrosive • Causes Irreversible Eye Damage • Harmful If Absorbed Through the Skin Or Inhaled

Do not get in eyes or on clothing. Wear goggles, face shield, or safety glasses. Wear chemical resistant gloves when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Avoid breathing dust, vapor or spray mist.

First Aid:

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

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

If swallowed: Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, 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.

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 sewage 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: Store in original container in secured dry storage area. Do not store above 122°F for extended periods of time. If container is damaged or spill occurs, use product immediately or dispose of product and damaged container as indicated below.

Pesticide Disposal: Waste resulting from the use of this product may be used in accordance with label or disposed at an approved waste disposal facility.

Container Disposal: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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

62719-231

UNREPRODUCIBLE COPY

Handwritten: 100% End Use Product

For Manufacturing Use Only

This product may be used only in the formulation of EPA-approved end use *dry* herbicide products with acceptable use patterns.

This product can only be used to formulate *dry* 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.

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-dichlorophenoxyacetic 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-dichlorophenoxyacetic 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 Residential Turf Granular Products: "When using this product, wear long-sleeved shirt, long pants, socks and shoes."; 2) For Acid Products Carrying "CAUTION" Signal Word And Will Be Mixed With Water Carrier: "When using this product, wear long-sleeved shirt, long pants, socks, shoes and chemical resistant gloves." 3) For Acid Products Carrying "Warning" Or "Danger" Signal Word And Will Be Mixed With Water Carrier: "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) Granular Products for Residential and Turf Use: "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 Products Mixed In Water Carrier: "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-dichlorophenoxyacetic 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 DowElanco 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. 62719-231

EPA Est. 62719-MI-1

DowElanco
Indianapolis, Indiana 46268-1189, U.S.A.

Herbicide

Net Weight - XXX lb.

EPA Approved 4/24/92

Revised 10/7/92

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-dichlorophenoxyacetic acid-containing end-use products formulated from this manufacturing use product as required by EPA.