

JUL 23 1999

E. Jay Finkel
Ram Research, Inc.
c/o Porter, Wright, Morris & Arthur
1667 K Street, N.W., Suite 1100
Washington, D.C. 20006-1605

Dear Mr. Finkel:

Subject: Revised Labeling and Confidential Statement of Formula;
Revised Signal Word and Precautionary Labeling;
Revised Basic Formulation
RAM 2,4-D Technical Acid
EPA Registration No. 69474-1
Your Submission Dated February 16, 1999

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) Delete the phrase "...if irritation persists" from the end of the dermal statement in the Statement of Practical Treatment.
- 2) Add an inhalation statement to the Statement of Practical Treatment to read "'IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.'"
- 3) Revise the statement within the Precautionary Statements currently reading "Harmful if swallowed or inhaled" to read "Harmful if swallowed, absorbed through skin, or inhaled."
- 4) Add a statement to the Precautionary Statements to read "Avoid breathing dust."

DK:305-7546:HB/PM23

CONCURRENCES

| | | | | | | | | |
|---------|----------|--|--|--|--|--|--|--|
| SYMBOL | D. KENNY | | | | | | | |
| SURNAME | 7505C | | | | | | | |
| DATE | 7/23/99 | | | | | | | |

- 5) Within the directions for use for Residential and Turf Sites, the statement regarding the Clothing Requirement Statements for acid, sodium salt and ester liquid products carrying a "WARNING" or "DANGER" signal word (section a, # 5) has omitted language. To correct this error, rewrite the beginning of the statement to read "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; acid, sodium salt and ester products applied in a liquid form and carrying "WARNING" or "DANGER" signal word ...".

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 February 16, 1999 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. This formulation supersedes all previous formulations for this product.

Sincerely yours,

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

Enclosure

3048

[RAM logo]

RAM

2,4-D TECHNICAL ACID

FOR USE ONLY IN FORMULATING HERBICIDES

NOT FOR RESALE

ACTIVE INGREDIENT:

2,4-dichlorophenoxyacetic acid* 97.9%

INERT INGREDIENTS: 2.1%

TOTAL 100%

*Isomer specific by AOAC Method No. 6 D 01-5.

EPA Reg. No. 69474-1

EPA Est. No. XXXXX-XX-X

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes. 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, eggwhites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

See below for precautionary statements.

Manufactured for:
RAM Research Inc.
Washington, D.C. 20006
by:
ATANOR S.A.
(1038) Buenos Aires
Argentina

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

JUL 23 1999

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

69474-1

NET WEIGHT
KG

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Harmful if swallowed or inhaled. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

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.

Formulators using this product are responsible for obtaining EPA registration of their formulated product.

Only for Formulation into an Herbicide for Use 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, stone fruits, 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, drainage ditchbanks, fence rows, tree injection treatments, forest site preparation, forest conifer release, woody plant control in noncropland areas and aquatic weed control.

LABELING OF END-USE PRODUCTS

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: "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 Requirement 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 Standard, 40 CFR Parts 156 and 170.

2. For Industrial/Aquatic Uses

a. Clothing Requirement 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, 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

a. Clothing Requirements 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 protection." 4) Products registered for use on residential and for 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; acid, sodium salt and ester 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 chemical-resistant gloves." 5) Products registered for use on residential and other turf sites (excluding sod farms) by homeowners and other non-commercial users, and for commercial sodium salt and ester 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, chemical-resistant gloves and eye protection. It is recommended that safety glasses include front, brow and temple protection." 6) 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." 7) 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."

STORAGE AND DISPOSAL

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

Storage: Store in original container in a locked storage area inaccessible to children or pets. Keep separate during storage to prevent cross-contamination of other pesticides, fertilizer, feed and food.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law and may contaminate ground water. 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: Completely empty container into formulation equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Important: Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals.

LIMITED WARRANTY

MANUFACTURER AND RAM RESEARCH INC. warrant that at the time of delivery the product will conform to the ingredient statement on the label, and that the product is suited for the labeled use when applied according to label directions. Because of widely varying use conditions, it is impossible to eliminate all risks even when label directions are followed.

EXCLUSION OF OTHER WARRANTIES AND REMEDIES

Except where such disclaimers and exclusions are specifically prohibited by applicable law, THE FOREGOING LIMITED WARRANTY IS THE ONLY GUARANTEE OR WARRANTY APPLICABLE TO THIS PRODUCT AND IS GIVEN EXPRESSLY AND IN LIEU OF ALL

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OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND ALL SUCH WARRANTIES WHICH EXCEED OR DIFFER FROM SAID LIMITED WARRANTY ARE DISCLAIMED BY MANUFACTURER AND RAM RESEARCH INC., and, upon Manufacturer's or Ram Research Inc.'s compliance with said limited warranty, BUYER SHALL HAVE NO REMEDY AGAINST MANUFACTURER OR RAM RESEARCH INC. FOR ANY TYPE OF DAMAGE OR LOSS, and, IN NO EVENT SHALL MANUFACTURER OR RAM RESEARCH INC. BE LIABLE FOR CONSEQUENTIAL DAMAGE OR LOSS.

