



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Theodore D. Head
Nufarm, Inc.
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527-0866

DEC 11 2003

Dear Mr. Head:

Subject: Label Revisions
 Nufarm Rhonox Solventless MCPA Ester Herbicide
 EPA Registration No. 71368-16
 Your Submission Dated July 22, 2003

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

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. At the beginning of the list of Personal Protective Equipment (PPE) within the Precautionary Statements, add the statements "Some of the materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart." In addition, revise the requirement for "waterproof gloves" to a requirement for "chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride."

b. Within the list of PPE for early re-entry in the Agricultural Use Requirements box, revise the requirement for "waterproof gloves" to a requirement for "chemical-resistant gloves made of any waterproof material."

c. Update the Environmental Hazards Statement to include the following:

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark.

Refer to PR Notices 93-3 and 93-8.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

If you have any questions concerning this letter, please contact Mr. James Stone at 703-305-7391.

Sincerely yours,

/s/

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

Enclosure

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ACCEPTED
with COMMENTS
In EPA Letter Dated
DEC 11 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
71368-16

Rhonox® Solventless MCPA Ester Herbicide

CONTROLS BROADLEAF WEEDS IN SMALL GRAINS, RANGELAND AND PASTURE,
TURF AND OTHER NON-CROP AREAS.

ACTIVE INGREDIENT:		
2-methyl-4-chlorophenoxyacetic acid, 2-ethylhexyl ester	65.3%*
INERT INGREDIENTS:	34.7%
		100.0%

*2-methyl-4-chlorophenoxyacetic acid equivalent 41.9% by weight or 3.7 pounds per gallon.

EPA Reg. No. 71368-16

EPA Est. No. 228-IL-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See Inside for Additional Precautionary Statements.

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300.
For Medical Emergencies Only, Call 877-325-1840

Manufactured For:
Nufarm, Inc.
Burr Ridge, IL
071368-00016.20030506.rsmeH

NET CONTENTS 2.5 GALLONS (9.46L)

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<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 IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for at least 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • 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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information	
NOTE TO PHYSICIAN	
No specific antidote is available. All treatment should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.	

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist.

PROTECTIVE EQUIPMENT (PPE): Applicators and other handlers must wear: Long-sleeved shirt and long pants, shoes, socks and waterproof gloves. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other household laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands thoroughly with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove PPE after handling this product and wash clothing before reuse. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Drift or run-off may adversely affect non-target plants. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwaters.

Avoid spray drift to susceptible plants such as cotton, beans, tomatoes and ornamental. Coarse sprays are less likely to drift. Do not apply when weather conditions favor drift from treated areas. Avoid use of small diameter spray nozzles. At high air or ground surface temperatures, vapors from this product may injure susceptible plants.

Do not use in a greenhouse.

Ground Water Contamination: Most cases of ground water contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of ground water supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent ground water contamination.

Cleaning of Equipment: Do not use the same spray equipment for other purposes unless thoroughly cleaned. When cleaning equipment, do not pour wash water on the ground; spray or drain over a large area away from wells and other water sources.

DIRECTIONS FOR USE

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

Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water, is: coveralls, shoes, socks and waterproof gloves.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Store in original container in a dry secured storage area. Keep container tightly closed when not in use.

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 can not 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: 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.

Plastic: Triple rinse or equivalent. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not apply this product through any type of irrigation system.

COMPATIBILITY

If Nufarm RHONOX® Solventless MCPA Ester Herbicide is to be tank mixed with other pesticides, compatibility should be tested prior to mixing. To test for compatibility, use a small container and mix a small amount (0.5 to 1 quart) of spray, combining all ingredients in the same ratio as the anticipated use. If any indications of physical incompatibility develop, do not use this mixture for spraying. Indications of incompatibility usually will appear within 5 to 15 minutes after mixing. Read and follow all directions and precautions on this label and on the labels of any product(s) for which a tank mixture is being considered.

GENERAL INFORMATION

This herbicide is effective on a large number of broadleaf weeds and is useful for controlling these weeds in certain crops. Several crops, such as oats, and small grains are more tolerant of MCPA than they are of 2,4-D.

Nufarm RHONOX® Solventless MCPA Ester Herbicide is an isooctyl ester formulation of MCPA that mixes easily in water, even in the hard waters found in some areas. Mix thoroughly while diluting this material and mix again if allowed to stand long before spraying.

WEEDS CONTROLLED BY PROPERLY APPLIED TREATMENTS OF THIS HERBICIDE INCLUDE THE FOLLOWING:

Amaranthus species (pigweeds)	dandelion	pepperweeds	ragweed (common and giant)
common burdock	field pennycress	(except perennial)	shepherdspurse
common cocklebur	mustard	plantains	thistle (bull and Russian)
common lambsquarters	(except blue mustard)	purslanes	Yellow rocket

Crop varieties vary in response to MCPA, and some may be easily injured. Apply this herbicide only to varieties known to be tolerant to MCPA. If you are uncertain concerning tolerant varieties or local use situations that may affect crop tolerance to MCPA, contact your seed company or state Agricultural Extension Service for advice.

RECOMMENDATIONS FOR APPLYING NUFARM RHONOX® SOLVENTLESS
MCPA ESTER HERBICIDE

CEREAL GRAINS

CROP	AMOUNT OF RHONOX® SOLVENTLESS PER ACRE	DIRECTIONS
WHEAT, BARLEY, OATS, and RYE (not underseeded with legumes): Annual weeds	1/2 pint	Apply after grain is in the 3-4 leaf stage, but not forming joints in the stem. Do not apply in the boot to dough stage
Annual and Biennial weeds Perennial broadleaf weeds	1 to 1-1/2 pints* 1-1/2 pints*	Apply after grain is fully tillered (usually about 4 to 8 inches high, but not forming joints in the stem). Do not apply in the boot to dough stage.

*Use the lower rate if small annual and biennial weeds are the major problem. Use the higher rate if perennial weeds or annual and biennial weeds are present which are in the hard-to-kill categories as determined by local experience. The higher rates increase the risk of grain injury and should be used only where the weed control problem justifies the risk of grain damage.

RESTRICTIONS AND LIMITATIONS FOR USE ON CEREAL GRAINS

Use a minimum of 10 gallons of water per acre for ground application and 2 gallons of water per acre for aerial application.

Do not allow livestock to forage or graze treated areas within 7 days of slaughter.

ESTABLISHED GRASS PASTURES AND RANGELAND

CROP	AMOUNT OF RHONOX® SOLVENTLESS PER ACRE	DIRECTIONS
Annual broadleaf weeds	1 to 2 pints	Apply when weeds are small and actively growing and prior to bud stage. Do not apply to newly seeded areas until grass is well established. Do not apply when grass is in the boot to milk stage if grass seed production is desired. Bentgrass and legumes may be injured by this treatment.
Perennial and biennial broadleaf weeds	2 to 3 pints	

RESTRICTIONS AND LIMITATIONS FOR USE ON PASTURES AND RANGELAND

For ground application, use a minimum of 10 gallons of water per acre.

For aerial application, use a minimum of 2 gallons of water per acre.

Do not graze animals on treated areas within 7 days after treatment.

GRASSES GROWN FOR SEED PRODUCTION

CROP	AMOUNT OF RHONOX® SOLVENTLESS PER ACRE	DIRECTIONS
Annual and perennial broadleaf weeds	1 to 2 pints	Apply to established stands in spring from tiller to early boot stage. Do not spray in boot stage. New spring seedlings may be treated with the lower rate after grass seedlings have at least 5 leaves. Perennial weed regrowth may be treated in the fall.

RESTRICTIONS AND LIMITATIONS FOR USE IN GRASSES GROWN FOR SEED

For ground application, use a minimum of 10 gallons of water per acre.

For aerial application, use a minimum of 2 gallons of water per acre.

NON-CROP
(Roadsides, fencerows, vacant lots, rights-of way and other similar areas)

CROP	AMOUNT OF RHONOX® SOLVENTLESS PER ACRE	DIRECTIONS
Annual, biennial and perennial broadleaf weeds	6 pints	Apply when annual broadleaf weeds are young and actively growing and perennial and biennial broadleaf weeds are actively growing and near the bud stage but before flowering. A second application may be required for best results on perennial and biennial weeds.

RESTRICTIONS AND LIMITATIONS FOR USE IN NON-CROP AREAS

For ground application use a minimum of 10 gallons of water per acre.
For aerial application use a minimum of 2 gallons of water per acre.

ORNAMENTAL TURF AREAS
(Golf Courses, Cemeteries and similar established grass areas)

CROP	AMOUNT OF RHONOX® SOLVENTLESS PER ACRE	DIRECTIONS
Annual broadleaf weeds	1 to 3 pints	Apply when annual broadleaf weeds are growing vigorously. Spring or fall applications will give the best results. Do not mow within 2 days before or after application. Do not use on lawns of creeping grasses such as bentgrass nor on freshly seeded turf until the grass has become well established.

RESTRICTIONS AND LIMITATIONS FOR USE IN TURF AREAS

For ground application on turf areas use enough water for good coverage (minimum of 10 gallons per acre)
Do not apply around houses, recreation sites or similar areas.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use when it is used in accordance with such directions; and (c) that the directions, warnings and other statements on this label are based upon responsible expert's evaluation of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants, and of residues on food crops, and upon reports of field experience. Test have not been made on all varieties or in all states or under all conditions. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FORM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

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