



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

May 8, 2025

Brien O'Loughlin
Agent for CAC Chemical Americas LLC
c/o Pyxis Regulatory Consulting, Inc.
535 Dock Street, Suite 211
Tacoma, WA 98402

Subject: PRIA Label Amendment – new storage and stability and corrosion characteristics data to support revising the Storage and Disposal section to specify container handling instructions for non-refillable metal ISO tanks and refillable plastic and metal ISO and IBC tanks
Product Name: CAC 2,4-D EHE Technical
EPA Registration Number: 92044-9
Application Date: January 26, 2024
Case Number: 497942

Dear Brien O'Loughlin:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

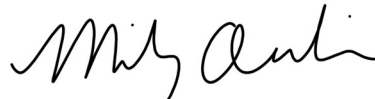
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website

is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Julia Kerr by phone at 202-566-2810 or via email at kerr.julia@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mindy Ondish".

Mindy Ondish
Product Manager 23
Herbicide Branch, Registration Division (7505T)
Office of Pesticide Programs

Enclosure

{Note to reviewer: [Text] in brackets indicates optional text}

CAC 2,4-D EHE Technical

For Manufacturing Use Only

ACTIVE INGREDIENT:

2,4-Dichlorophenoxyacetic acid, 2-ethylhexyl ester* w/w% 97.7%

OTHER INGREDIENTS: 2.3%

TOTAL: 100.0%

*CAS No. 1928-43-4

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID	
If Swallowed:	<ul style="list-style-type: none">• Call Poison Control or a doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by Poison Control or a 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 Poison Control or a doctor for treatment advice.
HOTLINE NUMBER Have the product container or label with you when calling Poison Control or a doctor or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Time (NPIC Web site: www.npic.orst.edu).	

FOR 24-Hour EMERGENCY ASSISTANCE: Spill, leak, fire, exposure, or accident Call CHEMTREC day or night at 1-800-424-9300 or 1-703-527-3887 if calling from outside of the U.S.

Manufactured for:

CAC Chemical Americas LLC
7 Castle View Court
Rye Brook, NY 10573

EPA Reg. No. 92044-9

EPA Est. No.

Net Contents: gals (L)

[Lot No.: See container]

{[See back[side] panel for Storage and Disposal and Conditions of Sale.]}

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wear long-sleeved shirt and long pants, shoes plus socks, and chemical-resistant gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and 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 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.

Only for formulation into herbicides.

(1) This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with USEPA data submission requirements regarding the support of such use(s) and

(2) uses for experimental purposes that are in compliance with USEPA requirements;

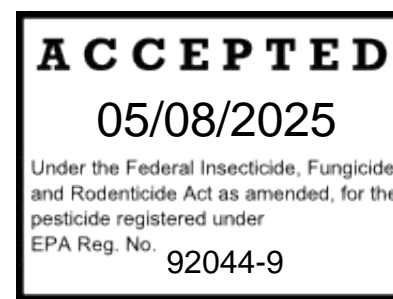
(3) Terrestrial food/feed uses:

Cereal grains (barley, millet, oats, rye, wheat)	Grasses (annual, perennial, grown for seed)	Potatoes (fresh market only)
Corn (field, pop and sweet)	Pastures and rangeland	Sorghum (grain, forage, milo)
Cranberries	Conservation Reserve Program (CRP)	Soybeans (preplant)

(4) Terrestrial non-food uses:

Christmas trees	Ornamental trees, shrubs, and vines
Established conifer release	Outdoor areas
Fallow cropland and crop stubble	Paved areas
Forest site preparation	Recreational sites and areas
Forest roadsides	Reforestation areas
Grass grown for sod	Tree injection treatments
Non-cropland uses (fence rows, hedgerows, roadsides, ditches, rights-of-way, utility power lines, railroads, airports, industrial sites, building perimeters, around irrigation equipment and roadways, and woody plant control)	Tree and brush control
	Turf (including lawns, golf courses, cemeteries, parks, sports fields, airfields, and other grass areas)
	Uncultivated agricultural areas and non-agricultural areas

Wettable powder formulations must be packaged in water-soluble packages.



{Note to reviewer: [Text] in brackets indicates optional text}

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage, disposal or cleaning of equipment.

PESTICIDE STORAGE: Keep container tightly closed when not in use. This product can be stored in an unheated building. In case of leak or spill, contain material and dispose as waste.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray, mixture or rinsate is a violation of Federal Law. 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 HANDLING:

[Nonrefillable Rigid Containers (Capacity Equal to or Less Than 5 Gallons): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into formulation equipment. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into formulation equipment or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then, offer for recycling if available or puncture and dispose of in a sanitary landfill or by other procedures allowed by state and local ordinances.]

[Nonrefillable Rigid Containers (Capacity Greater Than 5 Gallons): Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into formulation equipment. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or store rinsate for later use or disposal. Repeat this procedure two more times. Then, offer for recycling if available or puncture and dispose of in a sanitary landfill or by other procedures allowed by state and local ordinances.]

[Nonrefillable Containers (Size or Shape Too Large to be Tipped, Rolled or Turned Upside Down): Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying the contents from this container into formulation equipment and before final disposal using the following pressure rinsing procedure: Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure spray duration and/or spray volume. If the manufacturer's instructions are not available pressure rinse the container for at least 60 seconds using a minimum pressure of 30 PSI with a minimum rinse volume of 10% of the container volume. Drain pour or pump rinsate into formulation equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Then, offer for recycling if available or puncture and dispose of in a sanitary landfill or by other procedures allowed by state and local ordinances.]

[Refillable Containers (Capacity Greater Than 5 Gallons): Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, triple rinse as follows: Empty the remaining contents into formulation equipment. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into formulation equipment or store rinsate for later use or disposal. Repeat this procedure two more times. Return to point of sale or offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.]

[Refillable Containers (Size or Shape Too Large to be Tipped, Rolled or Turned Upside Down):

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, use the following pressure rinsing procedure: Insert a lance fitted with a suitable tank cleaning nozzle into the container and ensure that the water spray thoroughly covers the top bottom and all sides inside the container. The nozzle manufacturer generally provides instructions for the appropriate spray pressure spray duration and/or spray volume. If the manufacturer's instructions are not available pressure rinse the container for at least 60 seconds using a minimum pressure of 30 PSI with a minimum rinse volume of 10% of the container volume. Drain pour or pump rinsate into formulation equipment or rinsate collection system. Repeat this pressure rinsing procedure two more times. Return to point of sale or offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.]

CONDITIONS OF SALE

CAC Chemical Americas LLC ("CAC") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in accordance with the directions under normal conditions of use.

This warranty does not extend to the use of this product contrary to label instructions, or under abnormal use conditions, or under conditions not reasonably foreseeable to CAC. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CAC DISCLAIMS ALL OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE OR MERCHANTABILITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SELLER SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM OR IN CONNECTION WITH THE MANUFACTURE, SALE, DELIVERY, USE, HANDLING OR STORAGE OF THIS PRODUCT. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, SELLER'S LIABILITY SHALL BE LIMITED TO THE REFUND OF THE PURCHASE PRICE. CAC DOES NOT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE ANY OTHER WARRANTY, GUARANTEE OR REPRESENTATION CONCERNING THIS PRODUCT.**

[EPA Approval Date]