

United States Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
Washington, D.C. 20460



FAX TRANSMISSION

Special Review and Reregistration Division
Special Review Branch
Mail Code H7508W
Fax 703-308-8041

Date: 5/13/93

To: Carol van Strum

Fax No: (503) 528-7105

Telephone No: (503) 528-7151

From: Jill Bloom

Telephone No: (703) 308-8019

Total Pages (including cover sheet): 4

Special Instructions:

Call if you have questions. I'll get back to
you on your questions about the dioxin memo +
DCL.

AGREEMENT on EXPOSURE REDUCTION MEASURES for 2,4-D LABELS
Summary--April 1993

The agreement will be effected through the amendment of registrations of technical and manufacturing-use products containing 2,4-D acetic acid or any derivative of the acid. In addition to requiring new exposure reduction measures on product labels, the agreement also includes provisions for the implementation of a 2,4-D user education program on exposure reduction and for revised deadlines for submitting health and safety data required by the Agency. Where more restrictive requirements currently appear on product labels (because of multiple active ingredients, existing maximum application rates, or the like), the more restrictive requirements will apply.

Products containing the following active ingredients are covered by the exposure reduction measures:

2,4-Dichlorophenoxyacetic acid (2,4-D) and its derivatives:

Sodium salt of 2,4-D or sodium 2,4-dichlorophenoxyacetate

Diethanolamine salt of 2,4-D or diethanolamine 2,4-dichlorophenoxyacetate

Dimethylamine salt of 2,4-D or dimethylamine 2,4-dichlorophenoxyacetate

Isopropylamine salt of 2,4-D or isopropylamine 2,4-dichlorophenoxyacetate

Triisopropanolamine salt of 2,4-D or triisopropanolamine 2,4-dichlorophenoxyacetate

2-Butoxyethyl ester of 2,4-D or butoxyethyl 2,4-dichlorophenoxyacetate

Isooctyl (2-ethylhexyl) ester of 2,4-D or acetic acid, (2,4-dichlorophenoxy)-, 2-ethylhexyl ester

Isopropyl ester of 2,4-D or isopropyl 2,4-dichlorophenoxyacetate

Protective Clothing

All users and mixers/loaders/applicators (M/L/As) must wear long-sleeved shirt, long pants, shoes, socks.

M/L/As of agricultural, industrial (rights-of-way, roadside maintenance, etc.) and aquatic use products must also wear chemical-resistant gloves and face shield or safety glasses. Eye protection is not required for applicators in completely enclosed cabs or cockpits.

Users of turf liquid products with "WARNING" or "DANGER" signal words must also wear eye protection.

Commercial users of all turf liquid products, except when used on golf courses, must also wear chemical-resistant gloves.

Non-commercial users and users on golf courses of turf liquid ester, Na (sodium) salt, and acid products must also wear chemical-resistant gloves.

Non-commercial users and users on golf courses users of turf liquid amine products must also wear rubber gloves.

Persons who engage in open pouring of containers of over 1 gallon (and less than 5 gallons) in capacity must also wear coveralls or chemical-resistant apron.

Mechanical Transfer Systems

"Probe and pump" systems must be used for transferring the contents of containers 5 gallons or more in capacity. Probe must be decontaminated before removal from an empty container.

Maximum Application Rates

2 lbs. acid equivalent (ae) per acre per application for pasture and rangeland

4 lbs. ae per acre per application for forestry site preparation

2 lbs. ae per acre per application for turf

Maximum Application Frequency

2 broadcast applications per year per site for turf

Hygiene Statements

For agricultural, industrial, and aquatic uses:

"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 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 of 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."

For turf uses:

For 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."

For 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."

Restricted Entry Interval

Agricultural uses (including sod farms) and forestry uses are covered by the provisions of the Worker Protection Standard.

For turf: "Do not allow people (other than applicator) or pets on treatment area during application. Do not enter treated areas until spray has dried or dust has settled."

Effective Dates

Any consumer 2,4-D product formulated after October 23, 1993 or sold by the registrant after April 15, 1994 for use on sites other than turf (including sod farms) will have the new exposure reduction measures on the label.

Any consumer 2,4-D product formulated after June 15, 1994 or sold by the registrant after January 1, 1995 for use on residential or other turf sites (excluding sod farms) will have the new exposure reduction measures on the label.

For more information, contact:

Jill Bloom (703) 308-8019 or
Rich Dumas (703) 308-8015
Special Review and Reregistration Division (H7508W)
U.S. Environmental Protection Agency
401 M St., S.W.
Washington, DC 20460

Melinda Blackwell
741 S. Low Road
Seal Rock, Oregon 97376
(503) 563-4607

May 13, 1993

Jim Chambers, Lincoln County Road Superintendant
880 N.E. 7th
Newport, Oregon 97365

Re: Roadside spraying

Dear Mr. Chambers,

This is to confirm our conversation in your office on Tuesday May 11, 1993, at 4:30 p.m., when I hand-delivered the attached letter to Mr. Buisman. You stated that Mr. Stam, the assistant roadmaster, was in charge while Mr. Buisman was on vacation, and assured me that you would personally deliver the letter to Mr. Stam.

In response to my question whether your monthly vegetation management meetings were open to the public, you said I would have to call and get placed on the agenda. By this letter, I request that your next regularly scheduled vegetation management meeting, or a specially convened meeting, be open to the public and that you inform me in advance of the date of this meeting.

We also discussed the health study of Lincoln County road workers. You stated your belief that the Lincoln County Health Department was involved in the study, but did not respond to my question whether the study was public record. I emphatically requested that a copy of this study be added to the list of requests in my letter to Mr. Buisman. By this letter, I reiterate that request.

By this letter, I also reiterate my request that no roadside spraying be conducted before the materials we have requested have been provided and our group has had an opportunity to meet with your department to discuss our concerns.

Thank you for your courtesy in meeting with me on Tuesday. I look forward to hearing from you soon.

Sincerely,

Melinda Blackwell
Lincoln County Watershed Watch Alliance

cc: Lincoln County Commissioners
attachment