

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 30 2004

Mr. Mike Kellog
Pyxis Regulatory Consulting, Inc.
11324 17th Ave. Ct. NW
Gig Harbor, WA 98332

Subject: Cacodylate 3.25
EPA Registration No. 42519-4
Revised labeling submitted October 30, 2003

Dear Mr. Kellog:

The amended labeling referred to above is acceptable. This labeling supercedes all previously accepted labeling for this product (except supplemental labeling). A stamped copy of the label is enclosed for your records.

If you have any questions about this letter, you may call Tobi Colvin-Snyder at 703-305-7801.

Sincerely,

A handwritten signature in cursive script that reads "Tobi Colvin-Snyder, for".

Jim Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

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ACCEPTED
with COMMENTS
in EPA Letter Dated

JAN 30 2004

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
42519-4

LUXEMBOURG-PAMOL
Cacodylate 3.25

For Lawn and Ornamental Turf Use

ACTIVE INGREDIENTS:

- Sodium Cacodylate.....28.4%
- Dimethylarsenic Acid (Cacodylic Acid).....4.9%
- OTHER INGREDIENTS:.....66.7%**
- TOTAL:100.0%**

Total Arsenic (as elemental) all in water-soluble form 15.96%
Cacodylate 3.25 contains the equivalent of 3.25 lbs. Cacodylic acid per gallon.

Keep Out Of Reach Of Children

CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or 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 a poison control center or doctor. • <u>Do not give anything by mouth to an unconscious person.</u>
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 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 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.
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 1-800-424-9300 for emergency medical information.	

SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

EPA Reg. No.: 42519-4
EPA Est. No.: 42519-ISR-1

 Company **Manufactured for:**
 Logo **LUXEMBOURG-PAMOL, INC.**
 _____ **5100 Poplar Avenue, Suite 2700**
 Memphis, Tennessee 38137, U.S.A.

**FOR CHEMICAL SPILL, LEAK,
FIRE OR EXPOSURE CALL TOLL
FREE: 1-800-424-9300**

**AGRICULTURAL CHEMICAL
DO NOT SHIP OR STORE WITH
FOODS, FEEDS, DRUGS, OR
CLOTHING**

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product through any type of irrigation system. 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.

NON-AGRICULTURAL USE REQUIREMENTS
The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.
Keep children and domestic animals off treated areas until this material has been washed into the soil.
The area being treated must be vacated by unprotected persons.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Open dumping is prohibited. Do not store this product near fertilizers, seeds, insecticides, or fungicides. Do not store near heat or open flame. Freezing point of this product is approximately -5°F. If stored below freezing point, warm to 50°F and agitate thoroughly before using. Containers should not be stacked more than six (6) high. Reclose all partially used containers by thoroughly tightening screw cap. Damaged or leaking containers which cannot be used immediately should be transferred to suitable sound containers and properly marked. Absorb any spills with a suitable clay absorbent and dispose of as indicated under "Pesticide Disposal". For safety and prevention of unauthorized use, all pesticides should be stored in locked facilities.

Opened, partially used pesticides should be stored in original labeled containers when possible. When transfer to another container is necessary because of leakage or damage, carefully mark, and identify contents of the new container.

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 DISPOSAL [Agricultural Use Containers]: 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.

CONTAINER DISPOSAL [Homeowner Use Containers]:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Your local government may forbid pesticides in their landfills. Therefore, call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed. Avoid breathing spray mist. Avoid contact with skin, eyes, and clothing. In case of contact, immediately flush eyes or skin with plenty of water. Get medical attention if irritation occurs.

Personal Protective Equipment

Some 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.

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Chemical-resistant gloves Category A, such as butyl rubber \geq 14 mils, or natural rubber \geq 14 mils, or neoprene rubber \geq 14 mils or nitrile rubber \geq 14 mils
- Shoes and socks
- Protective eyewear
- Chemical-resistant apron when cleaning equipment, mixing or loading

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

User should:

- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
 - Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
 - Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
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ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning equipment or disposal of equipment washwaters. Do not apply when weather conditions favor drift from target area.

GENERAL INFORMATION

Cacodylate 3.25 is designed to kill grasses and weeds. It is non-selective in its herbicidal action. The phytotoxic properties of this material are quickly inactivated on contact with soil. Seed may be planted about 5 days after treatment.

APPLICATION METHODS:

Calculate the area to be treated and prepare the solution accurately. A surface-active (detergent or wetting) agent markedly improves effectiveness of this herbicide. Such a compound may be added in a proportion of 1% by volume of the final spray solution.

Dilute Cacodylate 3.25 with the correct volume of water, mix thoroughly, and apply to a measured area using any type of sprayer, according to the following chart.

Cacodylate 3.25 Application Rates

Liquid Measure of Cacodylate 3.25	Lbs. Cacodylic Acid (a.i.)	Add Water to Make	Apply To
½ pint (8 oz.)	0.2	2 gallons	412.5 sq. ft.
1 pint (16 oz.)	0.4	4 gallons	825 sq. ft.
2 pints (32 oz.)	0.8	8 gallons	1650 sq. ft.
4 pints (64 oz.)	1.6	16 gallons	3300 sq. ft.

Do not feed treated foliage to livestock or graze in treated areas.

LAWN RENOVATION

Apply Cacodylate 3.25 at any time during the growing season; preferably on warm, sunny days when grass is in rapid growth. Cover foliage thoroughly. Average turf will brown and die within five days. Certain weeds and matted turf may require a second treatment. Reapply in five days if necessary. New seed should be applied in about five days after treatment. Do not remove dead stubble unless the matted turf prevents the seed from making soil contact. Water heavily before seeding. Seed at rates indicated for new lawns. Keep area moist.

WEED AND GRASS CONTROL IN NON CROP AREAS

Carefully direct spray to the undesired vegetation along sidewalks, driveways and fences. Whenever necessary, repeat treatment in five days. A repeat treatment usually results in better kill than excessive single dosage. Bermudagrass and certain other deep rooted perennial grasses and weeds may not be killed. Cacodylate 3.25 may be used to kill noxious weeds and grasses near perennial shrubbery, around buildings and other structures, if precautions are used to keep spray from contacting desired vegetation.

CARE OF EQUIPMENT

Wash all spray equipment thoroughly after use to avoid corrosion of metal parts.

WARRANTY - CONDITION OF SALE

OUR RECOMMENDATIONS FOR USE of this product are based upon field use and tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the Seller. Buyer assumes all risks of use, storage and handling of this material not in strict accordance with directions given herewith.

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In no case shall Luxembourg-Pamol, Inc. or the Seller be liable for consequential, special, or indirect damages resulting from the use of this product when such use and/or handling is not in strict accordance with directions given herewith. The foregoing is a condition of sale by Luxembourg-Pamol, Inc. and is accepted as such by the Buyer.

NET CONTENTS:

Manufactured by Luxembourg Industries (PAMOL), Ltd.
Made in Israel