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264 - 498

11/08/99

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 8 1999

Mr. Nick Somma
Senior Registration Manager
Rhone-Poulenc
P.O. Box 12014
TW Alexander Drive
Research Triangle Park, NC 27709

Dear Mr. Somma:

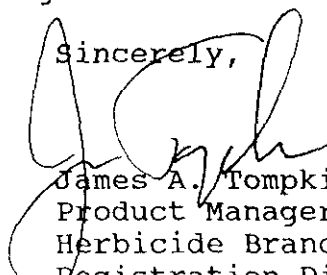
Subject: **Label Amendments-**
Removal of Child-resistant packaging
Folex 6 EC
EPA Reg. No. 264-498
Your submission dated October 12, 1999

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. Provide the Agency with an ending date when the child resistant packaging will no longer be used, for example, "after December 31, 1999, Folex 6EC will no longer use child-resistant packaging".
2. Under the heading, Personal Protective Equipment, revise the following text, "Applicators and other handlers must wear coveralls over long-sleeved shirt and long pants,...."
3. Submit two (2) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely,


James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

2/7
ACCEPTED
with COMMENTS
In EPA Letter Dated:
NOV 8 1999

FOLEX® 6 EC Cotton Defoliant

under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
264-498

Very Low Odor - FOR FAST AND EFFECTIVE COTTON DEFOLIATION

ACTIVE INGREDIENT: S, S, S-Tributyl phosphorotrithioate	71.5%
INERT INGREDIENTS:	28.5%
TOTAL	100.0%

Contains 6 pounds S, S, S-Tributyl phosphorotrithioate per U.S. gallon.
Contains Petroleum Distillates

EPA Reg. No. 264-498

EPA Est. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN DANGER PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

For **PRODUCT USE** information Call 1-800-334-9745

For **MEDICAL** And **TRANSPORTATION** Emergencies ONLY Call 24 Hours A Day 1-800-334-7577

STATEMENT OF PRACTICAL TREATMENT

Organophosphate

IF IN EYES: Hold eyelids open and flush with a steady, gentle stream of water for 15 minutes.

IF ON SKIN: Wash with plenty of soap and water.

IF SWALLOWED: Call a physician or poison control center. Drink promptly a large quantity of milk, egg white, gelatin solution, or if these are not available, large quantities of water. Avoid alcohol.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration preferably mouth to mouth. Get medical attention.

NOTE TO PHYSICIAN

This product inhibits cholinesterase resulting in stimulation of the central nervous system, the parasympathetic nervous system and the somatic motor nerves. Poisoning with this product also results in cardiovascular and respiratory symptoms which must be treated as separate pathological entities apart from the cholinergic effects.

Administer atropine sulfate to reverse cholinergic symptoms; and maintain a systematic, symptomatic treatment of the cardio-vascular and respiratory effects, even though the cholinergic symptoms have ceased. Do not give central nervous system depressants. Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. The use of oxygen is recommended in case of respiratory distress. Gastric lavage is not recommended because of the corrosive nature of FOLEX® and the petroleum distillates used in the formulation.

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive. Causes burns to the skin and irreversible eye damage. May be fatal if swallowed. Harmful if inhaled or absorbed through the skin. Do not get in eyes, on skin or on clothing. Avoid breathing vapor or spray mist.

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 F on an EPA chemical-resistance category chart.

Applicators and other handlers must wear coveralls over long-sleeved shirt and long pants, chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber or viton, chemical-resistant footwear plus socks, protective eyewear, chemical-resistant headgear for overhead exposure and chemical-resistant apron when cleaning equipment, mixing or loading.

For exposures in enclosed areas, a respirator with either an organic vapor-removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or a NIOSH approved respirator with an organic vapor (OV) cartridge or canister with any R, P or HE prefilter.

For exposure outdoors, dust/mist filtering respirator (MSHA/NIOSH approval number prefix TC-21C), or a NIOSH approved respirator with any R, P or HE filter.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow 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.

ENGINEERING CONTROLS STATEMENTS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Remove clothing immediately if pesticide gets inside. Then wash body thoroughly and put on clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwaters. Apply this product only as specified on this label.

PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

RESTRICTIONS

Do not apply FOLEX® 6 EC through any type of irrigation system.

Do not graze treated fields.

Do not use on other crops used for food or forage. Avoid spray drift to susceptible plants other than cotton as this product may injure or defoliate other crops. (Coarse sprays are less likely to drift.)

DIRECTIONS FOR USE

Read entire label before using this product.

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

This Supplemental Label must be in possession of the user at the time of pesticide application.

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 intervals. 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 (REI) of 24 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 over long-sleeved shirt and long pants, chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber or viton, chemical-resistant footwear plus socks, protective eyewear, and chemical-resistant headgear for overhead exposure.

REENTRY STATEMENT

Following FOLEX® 6 EC application, do not hand harvest or perform any other activities which may involve human contact with foliage until defoliation occurs which is usually 4 to 7 days under normal conditions.

STORAGE AND DISPOSAL

STORAGE

Do not store near fertilizers, seeds, insecticides, fungicides, feed or feedstuffs. Store in a cool, dry place away from open flame and extreme heat. Store in original container and out of the reach of children, preferably in locked storage area.

PESTICIDE DISPOSAL

Do not contaminate water, food or feed by storage or 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

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 procedures.

If container is leaking, invert to prevent leakage. Carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements for hazards associated with the handling of this product. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides above. In spill or leak incidents, keep unauthorized persons away.

GENERAL INFORMATION

FOLEX® 6 EC is a cotton defoliant that is used to remove leaves from cotton plants prior to anticipated harvesting. Formulated as an emulsifiable concentrate, FOLEX® 6 EC contains 6 pounds active ingredient per gallon. FOLEX® 6 EC is most commonly mixed with water and applied to cotton using either ground or aerial equipment. However, diesel oil may be substituted for water under adverse weather conditions. FOLEX® 6 EC is non-corrosive and will not damage metal parts normally used in applying spray chemicals.

FOLEX® 6 EC usually drops leaves in a green condition and will not appear effective until defoliation actually begins, approximately 3 days after application. By this time, the field will have an "off-cast" color. Under favorable conditions, satisfactory leaf drop will require 5 to 7 days. Adverse conditions, such as low temperatures and/or toughened plants (drought stressed, etc.) may extend this to 10 to 14 days.

FOLEX® 6 EC is effective when applied to cotton with a heavy dew. Once FOLEX® 6 EC has dried on the leaf, subsequent rainfall or dew does not adversely affect its activity. Application of FOLEX® 6 EC is not recommended when a heavy rainfall is expected within 1 hour after treatment. Conditions which delay absorption into the leaves are primarily those which cause the cotton leaves to be wilted, toughened, or leathery. When these conditions prevail, use diesel oil instead of water.

FOLEX® 6 EC does not suppress second growth especially where rainfall follows defoliation. A second application of FOLEX® 6 EC will be effective in defoliation of this second growth if excessive regrowth occurs between the first application and first and/or second harvest. FOLEX® 6 EC must be applied in sufficient water or diesel oil to give thorough coverage of the leaves. Larger droplets more effectively reach the lower leaves.

Use the higher FOLEX® EC rate under conditions of low temperature, low humidity, of plant stress.

FOLEX® 6 EC may be used alone for bottom defoliation of the leaves on the lower portion of the plant as a preconditioner prior to total defoliation, or as a total defoliation treatment. FOLEX® 6 EC may also be used in combination with Dropp (tank mix).

IMPORTANT: Observe all cautions and limitations on labels of all products used in mixtures specifically when FOLEX® 6 EC is tank mixed with products for use on cotton in areas where citrus is grown. Observe buffer zones and other restrictions on the FOLEX® 6 EC label and/or in the manufacturer's recommendations for FOLEX® 6 EC.

MIXING INSTRUCTIONS

FOLEX® 6 EC ALONE: Fill the spray tank 1/2 to 3/4 full with clean water. Begin agitation and add the recommended amount of FOLEX® 6 EC. Add water to the spray tank to the desired level. Maintain sufficient agitation to ensure a uniform spray mixture during application. Follow same mixing instructions when diesel oil is substituted for water.

TANK MIXTURES: Fill the spray tank 1/2 to 3/4 full with clean water and begin agitation. When tank mixing with Dropp, add the recommended amount of Dropp first. After Dropp is thoroughly mixed with water, add the recommended amount of FOLEX® 6 EC. Add water to the spray tank to the desired level. Maintain sufficient agitation while mixing and during application to ensure a uniform spray mixture. If spray mixture is allowed to remain without agitation for short periods of time, be sure to agitate until uniformly mixed before application. Do not use diesel oil when FOLEX® 6 EC is used in a tank mixture with other products. For bott opening and defoliation, see below.

COMPATIBILITY: To determine the compatibility of FOLEX® 6 EC with other products, do the following: (1) pour the recommended proportions of the products into a suitable container of water, (2) mix thoroughly and (3) allow to stand at least five minutes. If the combination remains mixed or can be re-mixed readily, it is considered physically compatible. For further information contact your local Rhône-Poulenc representative.

ADDITION OF ADJUVANTS: To improve spray coverage, FOLEX® 6 EC may be applied with the following adjuvants: (1) commercial blends of vegetable or petroleum-based oils, (2) non-ionic surfactant and (3) diesel oil (if allowed by local regulations). Diesel oil (3 - 5 gallons by air or 5 - 10 gallons by ground) may be helpful when night temperatures drop below 60°F, plant are under moisture stress or on storm-proof cotton varieties.

Only adjuvants which are exempt from tolerance requirements under 40 CFR 180.1001 may be used, Test the compatibility of FOLEX® 6 EC plus Dropp 50WP with the selected adjuvant prior to mixing in the spray tank (see Compatibility section).

DOSAGE: Use the specified dosage of FOLEX® 6 EC in water or once refined vegetable oil (see Recommended Applications Table) or diesel (see ADDITIONS OF ADJUVANTS). Apply sufficient spray to ensure uniform leaf wetting. All leaves must be treated for complete defoliation. FOLEX® 6 EC does not suppress secondary growth.

SPRAY EQUIPMENT CLEANING AND DECONTAMINATION: Do not allow pesticide mixtures to dry in spray equipment. Dried pesticide residues may become resuspended and damage other crops if uncleaned spray equipment is used to apply other products during the same or the following year.

Thoroughly clean the spray equipment with a chemical cleaner before using for other products. Use a cleaner such as "Spic and Span", "Fantastic", or "Formula 409". If chlorate type chemicals have been used in the same spray equipment, thoroughly wash spray tank and particularly dried deposits on aircraft fabric.

Immediately after applying FOLEX® 6 EC, remove all unused spray mixture and follow directions on this label for disposal. Thoroughly clean the spray tank, lines, nozzles, and exterior surfaces of spray equipment. Use one of the cleaners listed above. Follow directions on this label for disposal of wash and rinse water.

APPLICATION PROCEDURES

Do not apply FOLEX® 6 EC through any type of irrigation system.

FOLEX® 6 EC alone and in a tank mixture with Dropp can be applied by both ground and aerial equipment.

GROUND APPLICATION

Use a standard high clearance sprayer that provides a uniform and accurate application. Sprayer should be equipped with screens no finer than 50 mesh in the nozzle tips and in-line strainers. A minimum spray volume of 10 gallons per acre is recommended when FOLEX® 6 EC is applied with water and a minimum of 5 gallons per acre is recommended when FOLEX® 6 EC is applied with diesel oil.

AERIAL APPLICATION

Use aerial equipment equipped with a diaphragm-type nozzle that produces cone spray patterns with a maximum spray pressure of 40 psi at the nozzle tips. Nozzles should be located no farther than 3/4 the distance from the center of the aircraft to the end of the wing or rotor. The aircraft should discharge the spray a maximum of 10 feet above the crop. Do not apply when winds may cause drift to adjacent fields.

A minimum spray volume of 5 gallons per acre should be used when FOLEX® 6 EC and tank mixtures with FOLEX® 6 EC are applied with water. FOLEX® 6 EC alone may be applied in a minimum of 3 gallons of spray volume per acre when using diesel oil (minimum of 5 GPA in California).

FOLEX® 6 EC RECOMMENDATIONS

FOLEX® 6 EC RATE	MINIMUM SPRAY VOLUMES (gallons per acre)		DIRECTIONS
	PINTS/ACRE	GROUND	
1 to 1 1/2	10	--	Bottom Defoliation: Apply when bottom bolls are mature or when youngest bolls cannot be dented by pressure between the thumb and the forefinger or cut through with a sharp knife. Direct spray to thoroughly cover the leaves on the desired portion of plants to be defoliated. For Bottom Defoliation of Seed Cotton see below.
1 1/3 to 2	15	5	Complete Defoliation: Apply when fiber quality of top bolls will not be damaged by loss of top leaves, or when top bolls are firm to thumb pressure. Application can be made up until first frost.
2 1/2	15	5	Defoliation of Rank Cotton: Apply when 50% or more of the bolls are open. Treatment can consist of two applications (example: tank mix) but the total cannot exceed 2 1/2 pints/A. Applications can be made until first frost. Do not apply more than 2 1/2 pints of FOLEX® 6 EC per acre in any crop year.
2 to 2 1/2	15	5	Long Staple (Pima) Cotton Defoliation: Apply specified dosage as a tankmix with 1.2 to 0.4 lb. Dropp 50WP per acre. For best results, apply the combination to mature cotton plants with 60% or more open bolls.

BOTTOM DEFOLIATION OF SEED COTTON: Losses from rot and weathering can be reduced by using FOLEX® 6 EC to increase air movement and sunlight to bottom bolls. Use shielded drop nozzles to direct spray to the lower leaves. Remove the picker's top 8 to 12 rows of spindles to harvest the lower bolls. The picker will not injure the untreated top leaves and immature bolls. FOLEX® 6 EC may be applied for complete defoliation when top bolls are mature.

TANK MIXTURES AND SEQUENTIAL APPLICATIONS

DEFOLIATION AND BOLL OPENING

FOLEX® 6 EC can be tank mixed with other harvest-aid products or used sequentially to improve crop preparation for more efficient harvest. Use caution in selecting partner products, rates and application timing appropriate for your conditions. Consult your Rhône-Poulenc sales representative, crop consultant or university extension for local recommendations. In some instances rates as low as 0.33 pints/acre FOLEX® 6 EC when combined with a second harvest-aid product may be advisable for desired defoliation and or boll opening while avoiding unwanted leaf stick.

The combination of FOLEX® 6 EC and PREP™ brand Ethephon Plant Regulator is used for total plant defoliation and to accelerate cotton boll opening. FOLEX® 6 EC and PREP™ may be applied as a tank mixture or used in 2 separate sequential applications. Tank mixture of FOLEX® 6 EC + PREP™ is recommended for use in all cotton growing states as is applications of FOLEX® 6 EC sequential to PREP™ (minimum of 4 days between applications). FOLEX® 6 EC + PREP™ tank mixtures or sequential applications should be applied to cotton when there is sufficient mature unopened bolls to produce the desired yield and when 30% to 60% of the cotton bolls are open. If used in rank cotton, a pretreatment with FOLEX® 6 EC (See FOLEX® 6 EC RECOMMENDATIONS for use rate) may be useful to ensure thorough coverage of unopened bolls by later sequential application of PREP™. Refer to and observe all label use directions and precautions on the PREP™ label. Occasionally slight reduction on boll opening response has been observed when tank mixtures of FOLEX® 6 EC + PREP™ have been used.

DEFOLIATION AND INHIBITION OF REGROWTH

Tank mixtures such as FOLEX® 6 EC + DROPP are recommended for defoliation when heavy regrowth control is required. Defoliation and inhibition of regrowth is obtained when the tank mixture is applied to mature cotton plants when 60% or more bolls are open. A second application of labeled rates of FOLEX® 6 EC + Dropp, or FOLEX® 6 EC alone maybe made where necessary.

PRODUCT	RATE	DIRECTIONS
FOLEX® 6 EC + Dropp 50 WP	1 to 2 Pints/Acre + 0.066 to 0.1 lb/Acre	Mixing Order: (1) water (2) Dropp 50WP [follow Dropp label directions] (3) adjuvant, if used and (4) after Dropp 50WP has dispersed add FOLEX 6 EC. Apply by ground or air.

Use Limitations

- Tank-mix activity is maximum when 60% or more bolls are open and the mean 24-hour temperature before and after application is above 60°F.
- Use the lower rate of each product when conditions are favorable, for example, high temperatures and high humidity.
- Use the high rate of Dropp when environmental conditions favor heavy regrowth. When minimum night temperature is below 60°F use FOLEX® 6 EC alone.
- Adverse conditions may require a longer time for complete defoliation or a second application (FOLEX® 6 EC not to exceed 2 1/2 pints/A).
- Do not apply FOLEX® 6 EC plus Dropp 50WP to immature cotton (less than 60% bolls open) or higher than recommended product dosages, as desiccation and leaf freezing may occur.
- Refer to Dropp label for additional use directions and precautions when using tank mixtures of FOLEX® 6 EC with Dropp.
- Do not apply FOLEX® 6 EC within 7 days of harvest.

DEFOLIATION AND WEED CONTROL

FOLEX® 6 EC + HARVADE® For additional desiccation of certain weed species, FOLEX® 6 EC may be tank mixed at labeled rates with Harvade according to the directions for use on the Harvade label.

FOLEX® 6 EC + ROUNDUP® In states permitted by the Roundup label, the full labeled rate of FOLEX® 6 EC (1.33 - 2 pints/A) can be tank-mixed with Roundup to obtain defoliation, regrowth inhibition and to provide additional weed control to better facilitate harvesting. Refer to the Roundup label for use directions, regrowth inhibition statement, and weeds controlled.

Always follow the mixing directions found on this label, tank mix product labels and spray adjuvant product labels. Contact your local Rhône-Poulenc representative for additional information or call 1-800-334-9745.

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; (c) that the directions, warnings and other statements on this label are based upon responsible experts' 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. Tests 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 FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHEN USE OR HANDLING IS NOT IN ACCORDANCE WITH LABEL DIRECTIONS.

NOTICE TO BUYER

Purchase of this material does not confer any rights under patents governing this product or the use thereof in countries outside of the United States.

Rhône-Poulenc Ag Company
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709

Dropp is a trademark of Nor-Am Chemical Corporation.
Harvade is a trademark of Uniroyal Chemical Company.
Roundup is a trademark of Monsanto Company.
FOLEX is a registered trademark of Rhône-Poulenc.
PREP is a trademark of Rhône-Poulenc.

FOLEX 6-EC Cotton Defoliant

5/24/99