PM25 524-333



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 1 8 1994

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

LYDIA A. SUBA MONSANTO COMPANY AGENT FOR: MONSANTO AGRICULTURAL CO. 700 14TH ST., N.W. SUITE 1100 WASHINGTON, D.C. 20005

Subject: Label Amendment Submission of 7/22/93 Response to PR Notice 93-7 EPA Reg. No. 524-333 ROUNDUP D-PAK HERBICIDE

Dear Registrant:

The labeling cited above and submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is accepted subject to the comments reflected on the enclosed sheet. A copy of your proposed labeling stamped "ACCEPTED WITH COMMENTS" is enclosed.

WHAT THIS ACCEPTANCE MEANS:

Based on your certification, the Agency has accepted the labeling changes that are necessary to comply with the Worker Protection Standard (WPS) labeling requirements of 40 CFR part 156, subpart K, described in PR Notices 93-7 and 93-11. Any other labeling changes submitted in connection with this amendment application but not directly related to compliance with the WPS have not been reviewed or accepted by the Agency. If you wish to make such changes, you must submit a separate amendment application proposing them. If your product is currently suspended, the acceptance of this labeling amendment does not affect the suspension in any way.

WHAT YOU NEED TO DO NEXT:

By the next label printing make all the specified changes to your labeling. Send to EPA one (1) copy of the final printed labeling:

 BEFORE selling or distributing any product bearing the final printed labeling AND

• WITHIN one year from date of this acceptance.



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Submit the final printed labeling via the U.S. Postal Service to:

Document Processing Desk (FIN-LABEL) Office of Pesticide Programs (7505C) U.S. Environmental Protection Agency 401 M Street, SW Washington, D.C. 20460-0001

Hand or courier deliveries of final printed labeling may be made to:

Document Processing Desk (FIN-LABEL) Office of Pesticide Programs Room 266A, Crystal Mall 2 1921 Jefferson Davis Highway Arlington, VA 22202

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Sincerely, Jim Tompkins, Deputy Chief

Registration Support Branch Registration Division (7505W) 20138

Attachment

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division

Dr Russell P Schneider MONSANTO CO AGENT FOR: MONSANTO AGRICULTURAL CO 700 14TH ST, N.W. SUITE 1100 WASHINGTON DC 20005

Comment for: EPA Reg Nr.524-350 POLADO L PLANT GROWTH REGULATOR

The following specific comments pertain to your WPS labeling submission concerning the product cited above:

Remove the statement "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." from its current position within the Agricultural Use Box and place it above the Agricultural Use Box. Polado® L Plant Growt! Regulator by Monsanto

For use only on sugarcane.

For foliar application to hasten ripening and extend the period of high sucrose levels in sugarcane.

Complete Directions for Use

® Registered trademark of Monsanto Company

EPA Reg. No. 524-350

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Read the entire label before using this product.

Use only according to label instructions.

Read "LIMIT OF WARRANTY AND LIABILITY" before buying or using. If terms are not acceptable, return at once unopened.

REFORMULATION OR REPACKAGING IS PROHIBITED.

LIMIT OF WARRANTY AND LIABILITY

This Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Complete Directions for Use label booklet (''Directions'') when used in accordance with those Directions under the conditions described therein. NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, other tort or otherwise.

Buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those set forth in the Directions, application to or contact with desirable vegetation, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the

ACCEPTED with COMMENTS in EPA Letter Dated

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Under the Foderal Insecticide, Fundicide, and Redenticide Act as amended, for the pesticide registered under EPA Reg. No. product is applied, as well as weather conditions which are outside the application ranjes set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those set forth in the Directions in or on the soil, crop or treated vegetation.

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THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. IN NG EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

Keep out of reach of children.

CAUTION!

MAY CAUSE EYE IRRITATION.

MAY BE HARMFUL IF INHALED.

Avoid contact with eyes, skin and clothing.

Avoid breathing vapor or spray mist.

Wash theroughly with seap and water after handling.

FIRST AID: IF IN EYES, flush with plenty of water for at least 15 minutes. Call a physician.

IF INHALED, remove individual to fresh air. Seek medical

attention if breathing difficulty develops.

IF ON SKIN, flush with water. Wash slothing before reuse.

Personal Protective Equipment:

Applicators and other handlers must wear long-sleeved shirt and long pants, shoes plus socks. 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.

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 Recommendation:

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

In case of emergency involving this product, Call Collect, day or night, (314)694-4000.

Environmental Hazards

Do not apply directly to water or wetlands (swamps, bogs, marshes or potholes). Do not contaminate water when disposing of equipment washwaters.

In case of:

SPILL OR LEAK, soak up and remove to a landfill.

Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers. DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLE3S STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

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ACTIVE INGREDIENT:
*Glyphosate, N-(phosphonomethyl)
glycine, as the
isopropylamine salt
INERT INGREDIENTS:
100.0%

* Contains 4 pounds per U.S. gallon glyphosate.

GENERAL INFORMATION

This product is a foliar-applied plant growth regulator to hasten ripening and increase the level of sucrose in sugarcane. It is effective in both low and high-tonnage sugarcane.

When applied as directed under the conditions described, this product will hasten ripening and extend the period of high sucrose level in sugarcane.

As a result of leaf desiccation, improved trash burn can be expected.

Do not apply to any crops other than sugarcane.

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

Rainfall within 6 hours after application may reduce effectiveness. Use of this product in any manner not consistent with this label may result in injury to persons, animals or crops, or other unintended consequences.

Within 2 to 3 weeks after application, this product may produce a slight yellowing to pronounced browning and drying of leaves, and a shortening of upper internodes. Spindle death may occur.

Most of the sucrose increase is concentrated in the top nodes of the treated cane stalk. In order to recover the maximum sugar where topping is practiced during harvest, top at the base of the fourth leaf. Prior to application, consult your state sugarcane authority or local Monsanto representative regarding the degree of sucrose response anticipated from the variety of sugarcane to be treated. Do not plant to subsequent crops other than the following for 30 days after application:

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ALFALFA ARTICHOKE (JERUSALEM) ASPARAGUS BARLEY BEANS (ALL) BEET GREENS BEETS (RED, SUGAR) BLACKBERRY BOYSENBERRY BROCCOLI CABBAGE CAULIFLOWER CELERY CHICKORY CORN (ALL) COTTON CRANBERRY CUCUMBER CURRANT DEWBERRY EGGPLANT ELDERBERRY FORAGE GRASSES FORAGE LEGUMES GARLIC GOOSEBERRY GOURDS HORSERADISH HUCKLEBERRY KALE LENTILS LETTUCE LOGANBERRY MELONS MUSTARD GREENS OATS OKRA OLALLIEBERRY ONION PARSNIPS PEANUTS PEAS (ALL) PEPPER PINEAPPLE

POTATO (IRISH, SWEET) PUMPKIN RADISH RASPBERRY (BLACK, RED) RICE RUTABAGA SORGHUM (MILO) SOYBEANS SPINACH SQUASH (SUMMER, WINTER) TOMATILLO TOMATOES WATERMELON WATERCRESS WHEAT

NOTE: Application of this product may initiate development of shooting eyes.

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This product may not increase the sucrose content of sugarcane under conditions of good natural ripening.

Do not apply to sugarcane to be harvested for seed purposes.

Do not feed or graze treated sugarcane forage following application.

AERIAL APPLICATION

Apply the recommended rates of this product in 5 or more gallons of water per acre with either airplane or helicopter aerial spray equipment.

ATTENTION

AVOID DRIFT -- Extreme care must be used when applying this product to prevent injury to desirable plants and crops. Do not apply during inversion conditions, when winds are gusty, or under any other condition which will allow drift. Drift may cause damage to any vegetation contacted to which treatment is not intended. To prevent injury to adjacent desirable vegetation, appropriate buffer zones must be maintained.

Coarse sprays are less likely to drift; therefore, do not use nozzles or nozzle configurations which disperse spray as fine spray droplets. Do not angle nozzles forward into the airstream and do not increase spray volume by increasing nozzle pressure.

ENSURE UNIFORM APPLICATION -- To avoid streaking, uneven or over-lapped application, use appropriate marking devices.

Thoroughly wash aircraft, especially landing gear, after each day of spraying to remove residues of this product accumulated during spraying or from spills. PROLONGED EXPOSURE OF THIS PRODUCT TO UNCOATED STEEL SURFACES MAY RESULT IN CORROSION AND POSSIBLE FAILURE OF THE PART. LANDING GEAR ARE MOST SUSCEPTIBLE. The maintenance of an organic coating (paint) which meets aerospace specification MIL-C-38412 may prevent corrosion.

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NOTE: Use of this product in any manner not consistent with this label may result in injury to persons, animals, or crops, or other unintended consequences.

MIXING AND APPLICATION INSTRUCTIONS

APPLY THESE SPRAY SOLUTIONS IN PROPERLY MAINTAINED AND CALIBRATED EQUIPMENT CAPABLE OF DELIVERING DESIRED VOLUMES.

Mix only with clean water. When not in use, keep container closed to prevent spills and contamination.

NOTE: REDUCED RESULTS MAY OCCUR IF WATER CONTAINING SOIL IS USED, SUCH AS WATER FROM PONDS AND UNLINED DITCHES.

MIXING

This product mixes readily with water. Mix spray solutions of this product as follows: fill the mixing or spray tank with the required amount of water while adding the recommended amount of this product. Remove hose from tank immediately after filling to avoid siphoning back into the carrier source.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

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)