JUN 1 4 1983

Mr. E. George Pazianos Vineland Chemical Company c/o Pazianos Associates 211 9th Street, NE Washington, DC 20002

Dear Mr. Pazianos:

Subject: Amendment - Delete unnecessary label language and/or substitute with a clarifying text limited to specific situations

RAD-E-CATE 35 Cotton Defoliant (Split labeling)

EPA Registration No. 2853-28

Your Submission of June 7, 1983

This acknowledges receipt of your letter of June 7, 1983, submitting revised draft labeling under this registration.

with respect to the revised label submitted, we have the following comments:

- 1. Make the following label change before you release the product for shipment bearing the amended label:
 - a. In the "added" paragraph under NOTE: "RAD-E-CATE 35 contains a...will enhance weed control," qualify "crop oil concentrate" and "appropriate surfactant" with (which is cleared for application to growing crops).

Refer to the enclosed PR Notice 83-3 dated March 29, 1983, regarding Storage and Disposal label statements.

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

Sincerely yours,

Richard F. Mountfort Product Manager (23)
Fungicide-Herbicide Branch
Registration Division (TS-767)

RD: IKEDA: DCR-18151: WANG-0931C: pjp: Rayen: 479-2013: 6/13/83							
Enclosures							

EVANDE EL CANTES ES COMONDEFOLIANT

ACTIVE INGREDIENTS:

*Sodium Cacodylate
Dimethylarsinic Acid (Cacodylic Acid)
INERT INGREDIENTS:

29.00% 5.00% 66.00%

Total

100.00%

Total Arsenic (as elemental) all in water soluble form Contains 3.25 lbs. Cacodylic Acid Equivalent per gallon. 16.28%

CAUTION:

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

• Harmful if swallowed or inhaled. Avoid breathing spray mist. (Coarse sprays are less likely to drift.) Avoid contact with eyes, skin or clothing. Causes eye irritation. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children and domestic animals off treated areas until washed into the soil. Avoid contamination of feed or food products.

STATEMENT OF PRACTICAL TREATMENT

If swallowed, call a physician immediately. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconclous person. If on skin, wash with plenty of soap and water. Get medical attention if irritation persists.

If inhaled, remove victim to fresh air. Apply artificial respiration, preferably mouth to mouth, if indicated.

If in eyes, flush with plenty of water. Get medical attention if irritation persists.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds and other wildlife. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of wastes.

A Product Manufactured by The Vineland Chemical Co.

ACCEPTED with comments JUN 1 4 1983



VINELAND CHEMICAL COMPANY

VINELAND, NEW JERSEY

2853.28

GENERAL INFORMATION: RAD-E-CATE 35 Cotton Defoliant is used as a harvest aid for the defoiliation of cotton. Its phytotoxic properties are quickly inactivated on contact with the soil. It is a combination of a defoliating agent and surfactant (which is cleared for application to growing crops). It is desirable to add additional surfactant (which is cleared for application to growing crops) when using ground application equipment (see use directions); none need be added for aerial application.

CARE OF EQUIPMENT: Although RAD-E-CATE 35 Cotton Defoliant is only moderately corrosive, do not apply with any applicator having zinc, aluminum, magnesium or alloy components.

DIRECTIONS FOR USE:

DEFOLIATION OF DRYLAND COTTON: Apply 2-2½ pints per acre 7-10 days prior to harvest and when over 50% of bolls are open.

DEFOLIATION OF IRRIGATED COTTON: Apply ½ pint per acre more than dryland cotton rate.

NOTE: For defoliation all leaves must be contacted by properly placed nozzles. If applied by aircraft use 5-10 gallons of water per acre. If applied by ground equipment a volume of 15-20 gallons of water per acre should be used to which is added about ½ pint of a non-ionic surfactant. Do not feed treated foliage to livestock or graze treated areas.

Avoid contact with aircraft components to avoid corrosion.

RAD-E-CATE 35 contains a suitable wetting agent for normal use. However in certain arid regions for hard to kill and larger weeds addition of a crop oil concentrate or an additional appropriate surfactant will enhance weed control.

latter de vand de mut

TANK MIXING INSTRUCTIONS: Tank mixtures with DEF cotton defoliants may be added for more consistent defoliation under wider range of conditions. Use RAD-E-CATE 35 at 1½ to 2 pints per acre and an added defoliant at 1-1½ pints per acre. Observe all directions, precautions, and limitations on both products' labels. Do not exceed recommended label rates for each individual defoliant chemical. Do not add additional surfactant or oils when using tank-mix applications.

STORAGE AND DISPOSAL

PROHIBITION: Do not store near feed or food products

PESTICIDE DISPOSAL: Pesticide, spray mixture or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state or local procedures.

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then puncture and dispose of in a sanitary landfill or by other approved state and local procedures.

BEFORE USING ANY HERBICIDE, STOP AND READ THE LABEL

NET CONTENTS

EPA REG. NO. 2853-28 - EPA EST. NO. 2853-NJ-1

Printed in U.S.A.