MAR 2 9 1996

Gary R. Sandberg Elf Atochem North America, Inc. 2000 Market Street - 21st Floor Philadelphia, PA 19103

Dear Mr. Sandberg:

Subject: Revised Labeling - Delete Skull and Crossbones;

Delete Statement Prohibiting Use Where Fish are an

Important Resource

Hydrothol 191

EPA Registration No. 4581-174

Your Submissions Dated May 17 and July 31, 1995

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provisions:

1) Rewrite the Statement of Practical Treatment to read as follows:

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

"IF ON SKIN: Wash with plenty of soap and water. Get medical attention."

"IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting."

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

- 2) Revise the sentence reading "Harmful if inhaled" in the Precautionary Statements to read "May be fatal if inhaled."
- 3) Revise the sentence reading "Avoid breathing spray mist" in the Precautionary Statements to read "Do not breathe vapor or spray mist."

DK:305-7546: F1+B/PM23 concurrences									
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SURMAME >	D. KENNY								
DATE	3/26/96		_						

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A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

Sincerely yours,

Joanne I. Miller Product Manager (23) Fungicide-Herbicide Branch Registration Division (7505C)

Enclosure

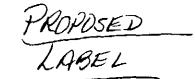
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ACCEPTED with COMMENTS In EPA Letter Dated MAR 2 9 1996

Under the Federal Inscritcide, Fundicide, and Redemicide Act as amended, for the posticide registered under EPA Reg. No.



AQUATIC ALGICIDE AND HERBICIDE

*7-oxabicyclo [2.2.1] heptane-2,3-dicarboxylic acid equivalent 23.36%

**Alkyl groups as derived from Coconut Oil

DANGER STATEMENT OF PRACTICAL TREATMENT

IF SWALLOWED, drink promptly a large quantity of milk, egg whites, gelatin solution or if these are not available, drink large quantities of water. Avoid alcohol. Call a physician immediately.

IF ON SKIN, immediately flush with plenty of water for at least 15 minutes. Remove and wash contaminated clothing before reuse.

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

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression and convulsion may be needed.

See Side Panel for Additional Precautionary Statements

EPA Registration No. 4581-174

EPA Establishment No. 4581-TX-1

Net Contents ___ Gallons/__ Liters

ELF ATOCHEM NORTH AMERICA, INC.
Agchem Division

2000 Market Street, Philadelphia, PA 19103

GENERAL INFORMATION

HYDROTHOL 191 is a liquid concentrate soluble in water and is a highly effective aquatic herbicide and algicide for use in irrigation and drainage canals, lakes and ponds to control the following weeds and algae: Najas, Elodea, Coontail, Potamogeton, Milfoil sp., Zannichellia, Vallisneria, Cladophora, Pithophora, Spirogyra, and Chara when weeds are actively growing. Dosage rates indicated are measured in "Parts per Million" (ppm). 1.0 ppm as a dosage rate means that there would be 1 part endothall (acid) in 1,000,000 parts of water.

Necessary approval and/or permits should be obtained in States where required. Consult state water or conservation authorities before applying to public waters or to ponds, canals or streams which flow into public waters.

DIRECTIONS FOR USE

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

IRRIGATION AND DRAINAGE CANALS

Apply HYDROTHOL 191-as a surface spray with uniform coverage or inject under the surface of the water. The minimum contact time with weeds for optimum results should be two hours.

HEAVY INFESTATION—Apply at rate 1, 40 to 6.75 gall per acre foot-(equivalent to 3.0-5.0 ppm). See table below.

MODERATE OR LIGHT INFESTATIONS—Apply at rate of 1.4 to 2.7 gal. per acre foot (equivalent to 1.0-2.0 ppm). See table below.

GALLONS OF HYDROTHOL 191 REQUIRED TO TREAT 1 MILE OF DITCH, 1 FOOT DEEP

Width of Ditch or Canal in Feet										
ppm	4	6	8	10	12	14	16	18	20	22
1.0 ppm	0.7	1 0	1.3	1.7	1 9	2.3	2.6	2 9	3.3	3 6
2.0 ppm	1.3	2.0	2.6	3.3	3.9	4.6	5 2	59	6.5	7.2
3 0 ppm	2.0	2.8	3.9	4.9	5 9	6.8	7.8	88	9.8	10.0
4 0 ppm	2.6	3 9	5.2	6.6	7.8	9.1	10.4	11.8	13.1	14.4
5 0 j.pm	3 2	4.9	6.5	8.2	9.7	11.5	13 1	14 7	16.4	18.0
Note 1.1 p	t HYDR(OTHOL 1	91 per ac	re foot e	quals 0	1 ppm of	endothal	(acid)		

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LAKES AND PONDS

ALGAE CONTROL: Cladophora, Pithophora, Spirogyra, and Chara can be controlled with applications of 0.6 to 2.2 pints per acre foot (0.05 to 0.2 ppm) applied as a uniform surface spray or injected under water surface. Pithophora may require 0.2 ppm or higher. Dosages may be increased to 0.4 to 1.1 gals (0.3 to 0.8 ppm) where greater longevity of control is desired and for marginal treatments. Repeat treatments when algal growth reappears.

SUBMERGED AQUATICS: Due to the toxicity to fish, the use of HYDRO-THOL 191 for submerged aquatic weeds is suggested only by commercial applicators on a marginal or sectional rather than overall type treatment. Use 0.7 to 3.4 gals, per acre loot (0.5 to 2.5 ppm) on a marginal treatment either sprayed on or injected below, the surface. Use dosages over 1.0 ppm on very narrow margins or in areas, where some fish kill is not objectionable.

Do not treat more than 1/10 of the lake or pond at one time with doses in excess of 1.0 ppm.

APPROXIMATE QUANTITY OF HYDROTHOL 191 FOR ONE ACRE. TREATMENT

Y	1	1	Dosages for Various Concentrations in ppm							
Depth	10.05	0.1	0.2	0.3	0.5	0.8	1.0	2.0	5.0	
1 ft.	0.6 pts	1.1 pts	2.2 pts	.4 gal	.7 gal	1.1 gai	1.4 gal	2.7 gal	6.8 gal	
\$2 ft.	1.1 pts	2.2 pts	4.3 pts	8 gal	1 4 gal	2.2 gal	2.8 gal	5.4 gal	13.6 gal	
~ 4 ft.	2.2 pts	4 3 pts	8.6 pts	1.6 gal	2.7 gal	4.4 gal	5.4 gal	10.9 gal	27.2 gal	
6_ft.	3.3 pts	6.5 pts	12.9 pts	2.5 gal	4.1 gal	6.5 gal	8.2 gal	16 3 gal	40 8 gal	

*One acre equals approximately 208' x 208'

WARRANTY AND DISCLAIMER

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Elf Atochem and seller offer this product and the buyer and user accept it subject to the foregoing conditions of sale and warranty which may be varied only by agreement in writing signed by a duly authorized representative of Elf Atochem.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

DANGER

FATA! IF ABSORBED THROUGH SKIN. MAY BE FATAL IF SWALLOWED. CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE AND SKIN BURNS. HARMFUL IF INHALED. DO NOT GET IN EYES, ON SKIN OR ON CLOTHING. WEAR PROTECTIVE CLOTHING, RUBBER GLOVES, AND GOGGLES OR FACE SHIELD WHEN HANDLING. Wash thoroughly with soap and water after handling and before eating or smoking. Remove contaminated clothing and wash before reuse. Avoid breathing spray mist.

ENVIRONMENTAL HAZARDS

Fish will be killed by dosages in excess of 0.3 ppm. Do not use where fish are important resources.

Avoid contact with or drift to desirable plants or crops as injury may result.

Clean out application equipment after each operation.

Do not use fish from treated areas for food or feed within-three days after treatment.

Do not use water from treated areas for watering livestock, for preparing agricultural sprays for food crops, for irrigation or for domestic purposes within the following periods:

Up to 0.3 ppm— 7 days after application Up to 3.0 ppm—14 days after application Up to 5.0 ppm—25 days after application

STORAGE AND DISPOSAL

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

Storage Instructions: Store in the original container. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. In the event of spillage during handling or storage, absorb with sand or other inert material and dispose of absorbent in accordance with the Pesticide Disposal Instructions listed below.

Pesticide Disposal Instructions: Pesticide wastes are acutely hazardous. 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 Instructions: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

5-C110S-02 D1 (2/92)

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