MAY 10 2000

Mr. Christopher Davis
Elf Atochem North America, Inc.
2000 Market Street, 21st Floor
Philadelphia, PA 19103

Dear Mr. Davis:

SUBJECT: Label Amendments Clarifying Use Directions; Amending Rate Tables, Adding Weed Species; and Revising Irrigation Restriction
Aquathol K Aquatic Herbicide
EPA Registration Number: 4581-204
Your Submissions Dated February 9, 2000 and February 15, 2000 as Amended by Email on May 9, 2000

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

1. Change "feed" to "non-feed" in the statement regarding the use of treated water for irrigation that appears at the end of the Environmental Hazards section. As written, the statement is ambiguous and could be construed to allow the immediate use of treated water for irrigation of feed crops. The revised sentence should read:

"Treated water can be used to irrigate non-food or non-feed crops, established oramentals, and non-crop areas immediately."

2. In the rate table on page 3, insert a zero (0) before the decimal point in ".5" in the "Entire Pond/Lake or Large Area Treatment" rate range given to control Curlyleaf. The corrected rate range should read: "0.5-1.5 ppm".

RD:STANTON:PM Team 23:Rm. 239:CM-2:305-5218:Disk #12:S575833.LET

CONCURRENCES

SYMBOL ▸	7505C							
SURNAME ▸	S. Stanton							
DATE ▸	May 10, 2000							

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

A stamped copy of the label is enclosed for your records. Submit one copy of your final printed labeling incorporating these changes before you release the product for shipment.

Sincerely yours,

Susan L. Stanton, for

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

Enclosure

3/8

Aquathol® K
AQUATIC HERBICIDE

ACTIVE INGREDIENT:	
Dipotassium salt of endothall*	40.3%
INERT INGREDIENTS:	59.7%
TOTAL	100.0%

*7-oxabicyclo [2.2.1]heptane-2,3-dicarboxylic acid equivalent 28.6%
Contains per gallon 4.23 lbs. dipotassium endothall

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAY 10 2000
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 4581-204

KEEP OUT OF REACH OF CHILDREN

DANGER

STATEMENT OF PRACTICAL TREATMENT

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

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

NOTE TO PHYSICIAN: Measures against circulatory shock, respiratory depression, and convulsion may be needed.

EPA Registration No. 4581-204

EPA Establishment No. 4581-MI-1

Elf Atochem North America, Inc.
2000 Market Street
Philadelphia, PA 19103

Net Contents:

GENERAL INFORMATION

AQUATHOL K is a liquid concentrate soluble in water which is effective against a broad range of aquatic plants with a margin of safety to fish.
Dosage rates indicated for the application of AQUATHOL K are measured in "Parts Per Million" (ppm) of dipotassium endothall. Only 0.5 to 5.0 ppm are generally required for aquatic weed control, whereas some fish species are tolerant to approximately 100 ppm or over.

DIRECTIONS FOR USE

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

HOW TO APPLY:

AQUATHOL K is a contact herbicide; consequently, do not apply before weeds are present. Application as early as possible after weeds appear and are actively growing is recommended for best results.

If an entire pond is treated at one time, or if the dissolved oxygen level is low at time of application, decay of weeds may remove enough oxygen from the water, causing fish to suffocate. Water containing very heavy vegetation should be treated in sections to prevent suffocation of fish. Sections should be treated 5-7 days apart. Carefully measure size and depth of area to be treated and determine amount of AQUATHOL K to apply from chart.

AQUATHOL K should be sprayed on the water or injected below the water surface and should be distributed as evenly as possible. It may be applied as a concentrate or diluted with water depending on the equipment. Some dilution will give better distribution. For best results apply when water is quiescent and/or flows are minimal.

In instances where the weed(s) to be controlled is an exposed surface problem (i.e., some of the broad-leaved pond weeds) coverage is important. For best results apply the concentrate or with the least amount of dilution with water compatible with the application equipment.

Necessary approval and/or permits should be obtained in states where required.

AQUATIC WEEDS CONTROLLED AND DOSAGE RATE CHARTS

AQUATHOL K is recommended for the control of the following aquatic weeds in irrigation and drainage canals, ponds and lakes at the rates indicated. Since the active ingredient is water soluble and tends to diffuse from the treated area, select the dosage rate applicable to the area to be treated. Use the lower rate in each range of rates where the growth is young and growing and/or where the weed stand is not heavy. Marginal treatments of large bodies of water require higher rates as indicated.

Aquatic Weed	RATES			
	Entire Pond/ Lake or Large Area Treatment	**Gallons per Acre Ft.**	**Spot or Lake Margin Treatment**	**Gallons per Acre Ft.**
Bur Reed, Sparganium spp.	3.0-4.0 ppm	1.9-2.6 gal.	4.0-5.0 ppm	2.6-3.2 gal.
Coontail, Ceratophyllum, spp	1.0-2.0 ppm	0.6-1.3 gal	2.0-3.0 ppm	1.3-1.9 gal.
Horned Pondweed, Zannichellia palustris	1.0-2.0 ppm	0.6-1.3 gal.	2.0-3.0 ppm	1.3-1.9 gal.
Hydrilla, Hydrilla verticillata	2.0-3.0 ppm	1.3-1.9 gal	3.0-4.0 ppm	1.9-2.6 gal.
Hygrophila, Hygrophila polysperma	4.0-5.0 ppm	2.6-3.2 gal.	5.0 ppm	3.2 gal.
Milfoil, Myriophillum spp.	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal
Naiad, Najas spp.	1.0-3.0 ppm	0.6-1.9 gal.	2.0-4.0	1.3-2.6 gal.
Pondweed, Potamogeton spp Including:	0.5-3.0 ppm	0.3-1.9 gal.	1.5-4.0 ppm	1.0-2.6 gal.
American, P. nodosus	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal.
Largeleaf (Bass Weed), P. amplifolius	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal.
Curlyleaf, P. crispus	.5-1.5 ppm	0.3-1.0 gal.	1.5-3.0 ppm	1.0-1.9 gal.
Flatstem, P. zosterformis	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal.
Floating-leaf, P. natans	1.0-2.0 ppm	0.6-1.3 gal.	2.0-3.0 ppm	1.3-1.9 gal.
Illinois, P. Illinoensis	1.5-2.5 ppm	1.0-1.6 gal	2.5-3.5 ppm	1.6-2.3 gal.
Narrowleaf, P. pusillus	1.0-2.0 ppm	0.6-1.3 gal.	2.0-3.0 ppm	1.3-1.9 gal.
Threadleaf, P. filiformis	2.0-3.0 ppm	1.3-1.9 gal	3.0-4.0 ppm	1.9-2.6 gal.
Sago, P. pectinatus	1.0-2.0 ppm	0.6-1.3 gal	2.0-3.0 ppm	1.3-1.9 gal.
Variable Leaf, P. diversifolius	1.0-2.0 ppm	0.6-1.3 gal	2.0-3.0 ppm	1.3-1.9 gal.
Parrotfeather, Myrophyllum aquaticum	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal.
Water Stargrass, Heteranthera spp	2.0-3.0 ppm	1.3-1.9 gal.	3.0-4.0 ppm	1.9-2.6 gal.

RATE OF APPLICATION---LAKES AND PONDS
The following chart indicates the total quantity of material to be applied.

APPROXIMATE GALLONS OF AQUATHOL K FOR ONE ACRE (208' times 208') TREATMENT

	DOSAGE IN GALLONS FOR VARIOUS CONCENTRATIONS IN PPM						
DEPTH	0.5 ppm	1.0 ppm	1.5 ppm	2.0 ppm	3.0 ppm	4.0 ppm	5.0 ppm
1 ft.	0.3	0.6	1.0	1.3	1.9	2.6	3.2
2 ft.	0.6	1.3	1.9	2.6	3.8	5.1	6.4
4 ft.	1.3	2.6	3.8	5.1	7.7	10.2	12.8
6 ft.	1.9	3.8	5.8	7.6	11.5	15.3	19.2

RATE OF APPLICATION---IRRIGATION AND DRAINAGE CANALS**
The following indicates the total quantity of material to be applied.

GALLONS OF AQUATHOL K REQUIRED TO TREAT 1 MILE OF CANAL 1 FOOT DEEP*

	WIDTH OF CANAL IN FEET			
PPM	5	10	15	20
1.0 ppm	0.4	0.75	1.2	1.5
2.0 ppm	0.75	1.5	2.3	3.0
3.0 ppm	1.2	2.3	3.5	4.5
4.0 ppm	1.5	3.0	4.5	6.0
5.0 ppm	2.0	3.8	5.7	7.5

The minimum contact time with weeds for optimum results should be 2 hours.
*For deeper water, adjust rate accordingly.
**Not for this use in California.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. MAY BE FATAL IF SWALLOWED OR INHALED. HARMFUL IF ABSORBED THROUGH SKIN. DO NOT GET IN EYES, ON SKIN, OR ON CLOTHING. DO NOT BREATHE SPRAY VAPORS.

Applicators and other handlers must wear:
- Long-sleeved shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

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 thoroughly and put on clean clothing.
- Remove protective clothing and equipment immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Avoid contact with or drift to other crops or plants as injury may result. Wash out spray equipment with water after each operation.

Do not use fish from treated areas for food or feed within 3 days of treatment. Do not use water from treated areas for watering livestock, for preparing agricultural sprays for food crops, for irrigation of food crops, or for domestic purposes within the following periods:

Up to 0.5 ppm dipotassium salt ---7 days after application
Up to 4.25 ppm dipotassium salt ---14 days after application
Up to 5.0 ppm dipotassium salt ---25 days after application

Treated water can be used to irrigate non-food or feed crops, established ornamentals, and non-crop areas immediately.

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. Storage at temperatures below 32°F may result in the product freezing or crystallizing. Should this occur the product must be warmed to 50°F or higher and thoroughly agitated. In the event of a 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 incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND DISCLAIMER

Elf Atochem North America warrants that this material conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the risks referred to therein. ELF ATOCHEM MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. IN NO CASE SHALL ELF ATOCHEM OR SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT INCLUDING, BUT NOT LIMITED TO, LOSS OF PROFITS, BUSINESS REPUTATION, OR CUSTOMERS; LABOR COST; OR OTHER EXPENSES INCURRED IN PLANTING OR HARVESTING.

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.