

4581-388

04/25/2000

1/7

APR 25 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 to Include Pounds per Acre Foot; Adding Calculations per 1000 sq. ft.; Adding Weed Species; and Revising Irrigation Restriction
Aquathol Super K Granular Aquatic Herbicide
EPA Registration Number: 4581-388
Your Submissions Dated February 9, 2000 and February 15, 2000 as Amended by Email on April 20, 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. Delete the phrase "if irritation persists" from the dermal statement of practical treatment.
2. Extend the box which currently encloses the heading "PRECAUTIONARY STATEMENTS" and the "HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)" section so that it encloses all of the precautionary statements, including the "ENVIRONMENTAL HAZARDS" section.
3. 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 ornamentals, and non-crop areas immediately."

4. In the table "Approximate Pounds of Aquathol Super K For 1000 Square Feet ..." which begins at the bottom of the fourth page, insert a zero (0) before the decimal point for every value less than 1 ppm (e.g., "0.05", "0.10", "0.2", etc.).

RD:STANTON:PM Team 23:Rm. 239:CM-2:305-5218:Disk #12:S576351.let

CONCURRENCES

SYMBOL ▶	7505C							
SURNAME ▶	S. Stanton							
DATE ▶	Apr 25, 2000							

-2-

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,

A handwritten signature in cursive script that reads "Susan L. Stanton, for".

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

Enclosure

AQUATHOL® SUPER K

GRANULAR AQUATIC HERBICIDE

ACTIVE INGREDIENT:

Dipotassium salt of endothall* 63.0%

INERT INGREDIENTS: 37.0%

TOTAL 100.0%

* 7-oxabicyclo [2.2.1]heptane-2,3-dicarboxylic acid equivalent 44.7%

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 or do not induce vomiting.

IF ON SKIN, Wash with plenty of soap and water. Get medical attention if irritation persists.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

See side panel for additional Precautionary Statements.

EPA Registration No. 4581-388

EPA Establishment No. 39578-TX-1

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

Net Weight: 25 lbs.

ACCEPTED
with COMMENTS
In EPA Letter Dated

APR 25 2000

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

4581-388

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS (AND DOMESTIC ANIMALS)
DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. MAY BE FATAL IF SWALLOWED. HARMFUL IF ABSORBED THROUGH THE SKIN. Do not get in eyes, on skin or on clothing. Wear protective eyewear (goggles or face shield). Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

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

Do not use water from treated areas for irrigation of food crops, for agricultural sprays on food crops or for domestic purposes within 7 days of treatment.

Do not use fish from treated areas for food or feed within 3 days of treatment.

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

GENERAL INFORMATION

AQUATHOL SUPER K is a granular aquatic herbicide for use in ponds and lakes which, under field test conditions has shown to be effective against a broad range of aquatic plants with a margin of safety to fish. Dosage rates indicated for the applications of AQUATHOL SUPER K are measured in "Parts Per Million" (ppm). 1 ppm as a dosage rate means that there would be 1 part of AQUATHOL SUPER K's active ingredient in 1,000,000 parts of water. Only 0.5 to 5 ppm are generally required for aquatic weed control, whereas some fish species are tolerant to approximately 100 ppm or over. For best results treat areas of one acre or more and/or margins of at least 100 feet in large bodies of water.

Thoroughly clean application equipment immediately after use.

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 SUPER K is a contact herbicide, consequently, do not apply before weeds are present. Treat as early as possible after weeds are present and are actively growing. If an entire pond is treated at one time, or if the dissolved oxygen level is low at the 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 proper amount of AQUATHOL SUPER K to apply. For best results apply when water is quiescent and/or flows are minimal.

Apply AQUATHOL SUPER K as evenly as possible over treated areas. A cyclone spreader is useful for this purpose. In instances where the nuisance weed(s) to be controlled is an exposed surface problem (i.e., some of the broadleaved pond weeds) coverage is important.

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

HOW TO DETERMINE DOSAGE RATE (Active Ingredient)

AQUATHOL SUPER K is recommended for the control of the following aquatic weeds at the rates indicated. Since AQUATHOL SUPER K's 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 when the growth is young and growing and/or where the weed stand is not heavy. Marginal treatments of large bodies of water require highest rates as indicated.

WEEDS CONTROLLED AND AQUATHOL GRANULAR DOSAGE RATE CHART

Aquatic Weed	RATES			
	Entire Pond/Lake or Large Area Treatment	Lbs. per Acre Ft.	Spot or Lake Margin Treatment	Lbs. per Acre Ft.
Bur Reed, Sparganium spp.	3.0-4.0 ppm	13.2-17.6 lbs.	4.0-5.0 ppm	17.6-22.0 lbs.
Coontail, Ceratophyllum spp.	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Horned Pondweed, Zannichellia palustris	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Hydrilla, Hydrilla verticillata	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Hygrophila, Hygrophila polysperma	4.0-5.0 ppm	17.6-22.0 lbs.	5.0 ppm	22.0 lbs.
Milfoil, Myriophyllum spp.	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Naiad, Najas spp.	1.0-3.0 ppm	4.4-13.2 lbs.	2.0-4.0 ppm	8.8-17.6 lbs.
Pondweed, Potamogeton spp. Including:	0.5-3.0 ppm	2.2-13.2 lbs.	1.5-4.0 ppm	6.6-17.6 lbs.
American, P. nodosus	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.

Largeleaf (Bass weed), <i>P. Amplifolius</i>	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Curlyleaf, <i>P. crispus</i>	0.5-1.5 ppm	2.2-6.6 lbs.	1.5-3.0 ppm	6.6-13.2 lbs.
Flatstem, <i>P. zosterformis</i>	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Floating-leaf, <i>P. natans</i>	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Illinois, <i>P. Illinoensis</i>	1.5-2.5 ppm	6.6-11.0 lbs.	2.5-3.5 ppm	11.0-15.4 lbs.
Narrowleaf, <i>P. pusillus</i>	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Slender, <i>P. filiformis</i>	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Sago, <i>P. pectinatus</i>	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Variable Leaf, <i>P. diversifolius</i>	1.0-2.0 ppm	4.4-8.8 lbs.	2.0-3.0 ppm	8.8-13.2 lbs.
Parrot feather, <i>Myriophyllum aquaticum</i>	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.
Water Stargrass, <i>Heteranthera</i> spp.	2.0-3.0 ppm	8.8-13.2 lbs.	3.0-4.0 ppm	13.2-17.6 lbs.

Approximate Pounds of Aquathol Super K For One Acre*
Treatment Dosage in Pounds For Various Concentrations In PPM

Depth	0.5 ppm	1.0 ppm	1.5 ppm	2 ppm	3 ppm	4 ppm	5 ppm
1 Ft. Deep	2.2	4.4	6.6	8.8	13.2	17.6	22
2 Ft. Deep	4.4	8.8	13.2	17.6	26.4	35.2	44
3 Ft. Deep	6.6	13.2	19.8	26.4	39.6	52.8	66
4 Ft. Deep	8.8	17.6	26.4	35.2	52.8	70.4	88
5 Ft. Deep	11	22	33	44	66	88	110

* One acre equals approximately 208' x 208'

Where the area being treated is greater than those listed in the charts, proceed as follows:

- Compute the approximate surface acreage
- Determine the average depth
- Multiply a. by b. to determine total number of acre/feet
- Multiply the pounds required at the 1 foot depth under the rate to be used by the number of acre/feet to determine the total quantity to be used.

Approximate Pounds of Aquathol Super K For 1000 Square Feet
Treatment Dosage in Pounds For Various Concentrations In PPM

Depth	0.5 ppm	1.0 ppm	1.5 ppm	2 ppm	3 ppm	4 ppm	5 ppm
1 Ft. Deep	.05	.1	.15	.2	.3	.4	.5
2 Ft. Deep	.10	.2	.3	.4	.6	.8	1.0
3 Ft. Deep	.15	.3	.45	.6	.9	1.2	1.5

4 Ft. Deep	.2	.4	.6	.8	1.2	1.6	2.0
5 Ft. Deep	.25	.5	.75	1.0	1.5	2.0	2.5

Where the depth is greater than 5 feet, multiply the depth by the appropriate rate for 1 ft depth to determine the amount of product required per 1000 square feet.

STORAGE AND DISPOSAL

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

Storage Instructions: Store in the original container, preferably in a locked storage area. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. If spilled during storage or handling sweep up spillage and dispose of in accordance with the Pesticide Disposal Instructions listed below.

Pesticide Disposal Instructions: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide 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.

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.