



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 2 1992

H. R. McLane
Authorized Agent for
Amvac Chemical Corp.
H. R. McLane, Inc.
7210 Red Road - Suite 206
Miami, FL 33143-5321

Dear Mr. McLane:

SUBJECT: Review of Labeling Amendments for Deleted Uses

1-Naphthaleneacetic Acid Sodium Salt
EPA Reg. No. 5481-218
1-Naphthaleneacetic Acid
EPA Reg. No. 5481-219
Technical Naphthaleneacetic Acid
EPA Reg. No. 5481-430 ✓
Technical 1-Naphthaleneacetamide
EPA Reg. No. 5481-431
Technical 1-Naphthaleneacetic Acid Sodium Salt
EPA Reg. No. 5481-432
Technical 1-Naphthaleneacetic Acid Ethyl Ester
EPA Reg. No. 5481-433
Your Letters Dated October 14, 1993

The labeling for each product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling for each of the products above must be submitted prior to releasing the product for shipment. Enclosed are copies of the stamped labels for your records.

1. Modify the ENVIRONMENTAL HAZARDS section of the labels to read:

"Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact our State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters."

2. Under the signal words of the labels, correct the Spanish instructions to read "Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle."

From each label where it appears, you must delete the statement, "The Environmental Protection Agency forbids the use of this product on Pinapples!"

3. You may want to include the following statement on all of your labels under the DIRECTIONS FOR USE section:

"Formulators using this product are responsible for obtaining EPA registrations for their formulated products."

Please refer to PR Notices 91-4 and 91-8 for guidance.

4. Correct the spelling errors in the the LIMITED WARRANTY section of your labels.
5. The following modifications apply to specific products:
 - a. For 5481-219, include the following statement under the DIRECTIONS FOR USE section: "Formulation into a plant growth regulator is prohibited for use on pineapples."
 - b. For 5481-431 and 5481-432, modify the STORAGE AND DISPOSAL section to follow the format on the 5481-430 label, i.e. separate the STORAGE, PESTICIDE DISPOSAL, and the CONTAINER DISPOSAL sections under this heading.
 - c. For 5481-430, 5481-431, and 5481-432, add the following statement under the STORAGE AND DISPOSAL section: "Do not contaminate water, food or feed by storage or disposal."
 - d. For 5481-433, please note that your request dated 10/14/93 to delete the use of olives for this product has been rescinded per your letter dated 04/05/94. Please refer to the Agency letter to you dated 05/09/94 for specific comments regarding this product. However, it has been brought to our attention by the Special Review and Reregistration Division that you are not supporting the olive use for reregistration.

You must clarify this matter immediately and comply with SRRD data requirements in support of the use on olives if applicable.

Sincerely yours,

/s/

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosures

cc: Susan Jennings

5481-430

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY

ACCEPTED
with COMMENTS
EPA Letter Dated:

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid 95.0%

INERT INGREDIENTS: 5.0%

Total 100.0%

IG 2 1994

EPA REG. NO. 5481-430

EPA Est. No. 5481-CA-1

is Federal Insecticide
and Fungicide Act
of 1947, for the pesticide
under EPA Reg. No.

5481-430

KEEP OUT OF REACH OF CHILDREN DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE.

WEAR SAFETY GOGGLES WHEN HANDLING.

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

Danger: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. 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 unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance contact your regional office of the EPA.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following:

LIMITED WARRANTY:

AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. AMVAC NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTY, EXPRESS OF IMPLIED. AMVAC EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, OR ANY OTHER WARRANTY OF QUALITY OR PERFORMANCE.

LIMITED WARRANTY (Cont.)

THIS WARRANTY DOES NOT EXTEND TO, AND THE USER SHALL BE SOLELY RESPONSIBLE FOR, ANY LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THIS LABEL'S DIRECTIONS, WARNINGS OR CAUTIONS. USER'S EXCLUSIVE REMEDY AND AMVAC'S OR SELLERS' EXCLUSIVE LIABILITY FOR ANY CLAIM, LOSS, DAMAGE, OR INJURY RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT, OR OTHERWISE SHALL BE LIMITED, AT AMVAC'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICES FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL AMVAC OR SELLER BE LIABLE FOR SPECIAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the US EPA. Formulation into a plant growth regulator is prohibited for use on pineapples. Formulators using this product are responsible for obtaining EPA supplemental distributor registrations for their formulated products.

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. 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: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner. (5481-430.PM4 / 10-15-83)

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY

1 - TRANSPORTATION: CHEMTREC 1-800-424-9300
2 - MEDICAL: HHS 1-800-228-5635 Ext. 169

Net Weight 50 Pounds

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. - LOS ANGELES, CA 900238 U.S.A.