



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

May 3, 2012

Kelly Naujock
AMVAC Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660

Subject: Label Amendment (ingredients statement, contact numbers,
company name, storage and disposal)
DEF Technical Defoliant
EPA Reg. No. 5481-9022
Application Dated April 2, 2012

Dear Ms. Naujock:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

A stamped copy of your label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipment after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed within a large, loopy oval shape.

Kable Bo Davis
Product Manager 25
Herbicide Branch
Registration Division (7505P)

Def[®] Technical Defoliant

For use in the manufacture of cotton defoliants.

ACTIVE INGREDIENT:

Tribuphos: S,S,S-Tributyl phosphorotrithioate 97.9%

OTHER INGREDIENTS: 2.1%

Total..... 100%

EPA Reg. No. 5481-9022

EPA Est. No.

STOP - Read The Label Before Use KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor for treatment advice. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice.

EMERGENCY INFORMATION

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

For Medical Emergencies phone:..... 1-888-681-4261
 For Transportation Emergencies, including spill, leak or fire, phone: CHEMTREC..... 1-800-424-9300
 For Product Use Information phone : AMVAC..... 1-888-462-6822

Note to Physician: This product inhibits cholinesterase resulting in stimulation of the central nervous system, the parasympathetic nervous system and the somatic motor nerves. Poisoning with this product also results in cardiovascular and respiratory symptoms which must be treated as separate pathological entities apart from the cholinergic effects.

Use atropine sulfate to reverse cholinergic symptoms; maintain a systematic, symptomatic treatment of the cardiovascular and respiratory effects, even though the cholinergic symptoms have ceased. Pralidoxime (2-PAM) may be indicated as antidotal therapy. Contact a medical toxicologist, poison center, or the Emergency Response telephone No. listed above for guidance on the optimal utilization of 2-PAM. Do not give central nervous system depressants. Watch for pulmonary edema, which may develop in serious cases of poisoning even after 12 hours. The use of oxygen is recommended in case of respiratory distress.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed, or absorbed through the skin. Do not get in eyes, or on clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse

Physical or Chemical Hazard: This product exhibits oxidizing potential. Do not mix or contact with oxidizing agent to prevent such hazard.

ENVIRONMENTAL HAZARDS

This product is toxic to terrestrial and aquatic plants, fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or 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 your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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

Only for formulation into a defoliant for use on cotton.

This product may be used to formulate products for specific use(s) not listed on the manufacturer's use product label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AMVAC DISCLAIMS ALL LIABILITY BASED ON BREACH OF WARRANTY, NEGLIGENCE, STRICT TORT LIABILITY, OR ANY OTHER THEORY OF LIABILITY FOR CROP DAMAGE OR FAILED EFFICACY RESULTING FROM THE USE OF THIS AMVAC PRODUCT AS AN INGREDIENT IN ANY FORMULATION WITH A USE NOT SPECIFICALLY LISTED ON THIS LABEL.

STORAGE AND DISPOSAL

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

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, seed, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If container is leaking, invert to prevent leakage. If the container is leaking or material spilled for any reason or cause, carefully dam up spilled material to prevent runoff. Refer to Precautionary Statements on label for hazards associated with the handling of this material. Do not walk through spilled material. Absorb spilled material with absorbing type compounds and dispose of as directed for pesticides above. In spill or leak incidents, keep unauthorized people away. You may contact the AMVAC for decontamination procedures or any other assistance that may be necessary. The telephone number for AMVAC is 1-888-462-6822 or contact Chemtrec at 800-424-9300.

Pesticide Disposal: Pesticide wastes are toxic. 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: Nonrefillable container. Do not reuse or refill. Triple rinse (or equivalent). Triple rinse as follows: Empty the remaining contents into application equipment or tank mix. Fill container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least on complete revolution, for at least 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

NET CONTENTS: As Marked on Container

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822

ACCEPTED

MAY - 3 2012

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under
EPA Reg. No. 5481-9022